Exhibit

9

Page 1

B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

BINGHAMTON UNIVERSITY COLLEGE REPUBLICANS, JOHN LIZAK, YOUNG AMERICA'S FOUNDATION,

Plaintiffs,

Index No.: 20-CV-0822

BRIAN ROSE, JOHN PELLETIER, COLLEGE PROGRESSIVES, PROGRESSIVE LEADERS OF TOMORROW, STUDENT ASSOCIATION OF BINGHAMTON UNIVERSITY, HARVEY G. STENGER,

Defendants.

Χ

DEPOSITION OF: JOHN RESTUCCIA

DATE:

January 10, 2023

TIME:

8:50 a.m. to 3:25 p.m.

LOCATION: Binghamton University

4400 Vestal Parkway Eat

Binghamton, New York 13902

Reported by Nicole Bunnell ASSOCIATED REPORTERS INT'L., INC. ARII@courtsteno.com (800) 523-7887 <u>www.courtsteno.com</u> Transcription - National and International reporting coverage



	Page 2
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	APPEARANCES:
3	FOR THE PLAINTIFFS:
4	KING & SPALDING, L.L.P.
5	BY: HAMILTON CRAIG, ESQ.
6	1700 Pennsylvania Avenue
7	Northwest Washington D.C. 20006-4707
8	FOR DEFENDANTS:
9	OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL
10	BY: JOHN MOORE, A.A.G.
11	AMANDA KURYLUK, A.A.G.
12	The Capitol
13	Albany, New York 12224
14	FOR BINGHAMTON UNIVERSITY:
15	BY: KEVIN HAYDEN, ESQ.
16	4400 Vestal Parkway
17	Binghamton University, Suite 614
18	Binghamton, New York 13902
19	FOR THE STUDENT ASSOCIATION:
20	AGWAD & INGRAHAM, L.C.C.
21	BY: THOMAS A. SAITTA, ESQ.
22	46 Front Street
23	Binghamton, New York 13905
24	
25	

		Page 3
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Res	stuccia
2	INDEX OF PROCEEDINGS	
3	JOHN RESTUCCIA: Sworn	
4	Direct Examination by Mr. Moore	7
5	Cross Examination by Mr. Saitta	361
6	Redirect Examination by Mr. Moore	379
7		
8		
9	REQUEST LIST	
10	. Mr. Moore requests Brian Murray's address	30
11	. Mr. Moore requests Text App and Facebook Message:	s 43
12	. Mr. Moore requests a search of any contact with	106
13	Raj Kannappan	
14	. Mr. Moore requests names of donors	113
15	. Mr. Moore requests Personal Email, Y.A.F. Email	130
16	. Mr. Moore requests Email chain, page 239	135
17	. Mr. Moore requests Speaker Packet	138
18	. Mr. Moore requests Email, Laffer Documents	
19	. Mr. Moore requests emails from all organizations	
20	. Mr. Moore requests email from Dr. Laffer	
21	. Mr. Moore requests Google Drive	308
22	. Mr. Moore requests papers of socialism	310
23		
24		
25		

		Page 4
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Res	tuccia
2	EXHIBIT INDEX	
3	Marked as	
4	Described as	
5	One	5
6	Complaint to University Y.A.F.	
7	Two	102
8	Plaintiffs' Disclosure email chain, P247-248	
9	Three	116
10	Records of Plaintiff emails, 5 emails, Pages 114-118	
11	Four	132
12	Plaintiffs' Disclosures, series of email September 26	,
13	2019, 237-247	
14	Five	146
15	Reservation Guidelines	
16	Six	148
17	From Plaintiffs' Disclosures, 119-120	
18	Seven	163
19	Defendant's Exhibit Seven, email chain from Joe Galla	gher
20	to Police	
21	Eight	173
22	Email between Restuccia and Gallagher, 1292	
23	Nine	175
24	Plaintiffs' email from Restuccia to Preston Scagneli,	P132
25	Ten	230

		Page 5
1	B.U. College, et al v Rose, et al - 1/10/23 - J. R	estuccia
2	Plaintiffs' Disclosure College Republican emails to	Raj,
3	208-218	
4	Eleven	127
5	Email, Tuesday Events, Dr. Laffer, Campus Event	
6	Twelve	249
7	Facebook Posts, 259-260	
8	Thirteen	243
9	Defendants' Exhibit 13, Email/Disclosures	
10	Fourteen	338
11	Defendants' Exhibit, email, Reservation Guidelines	
12	Fifteen	342
13	FRCP Rule 26 Document, Defendants' Exhibit, Video	
14	Sixteen	313
15	From Plaintiffs' Disclosures, 144-145	
16	Seventeen	244
17	Colored Photographs	
18		
19		
20		
21		
22		
23		
24		
25		

	Page 6
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	STIPULATIONS
3	It is HEREBY STIPULATED by and among the attorneys
4	for the respective parties, in accordance with the Federal
5	Rules of Civil Procedure, that this deposition may be
6	taken by the Defendant at this time, pursuant to subpoena;
7	FURTHER STIPULATED, that all objections except as to
8	the form of the questions and responsiveness of the
9	answers, be reserved until trial;
10	FURTHER STIPULATED, that the witness may read and
11	sign the deposition and make any corrections to same
12	before any Notary Public;
13	AND FURTHER STIPULATED, that if the original
14	deposition has not been duly signed by the witness and
15	returned to the attorney taking the deposition by the time
16	of trial or any hearing in this cause, a certified copy of
17	the deposition may be used as though it were the original.
18	
19	
20	
21	
22	
23	
24	
25	

	Page 7
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	(The deposition commenced at 8:50
3	a.m.)
4	THE REPORTER: Okay. Can you raise
5	your right hand?
6	. Do you swear and affirm to tell the
7	truth, the whole truth and nothing but the truth
8	during this testimony today?
9	MR. RESTUCCIA: Yes.
10	WITNESS; JOHN RESTUCCIA; SWORN
11	THE REPORTER: And can you state your
12	name full name for the record?
13	THE WITNESS: John Peter Restuccia.
14	THE REPORTER: The witness is sworn
15	in. On the record.
16	DIRECT EXAMINATION
17	BY MR. MOORE:
18	Q. Good morning, Mr. Retus good
19	morning, Mr. Restuccia. My name is John Moore. I'm
20	from the New York State Attorney General's Office,
21	and I'm representing the defendants Rose, Stenger and
22	Pelletier in this matter.
23	We're here for a deposition in the
24	matter of Young America's Foundation v. Stenger, et
25	al. This is a lawsuit in the Northern District of

	Page 8
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	New York, C.V. number is twenty C.V. eight twenty-
3	two. Are there is there any reason you can't
4	testify honestly to the questions I'm asking you here
5	today?
6	A. No.
7	Q. Okay. And your attorney had made
8	a point before we got on the record that he that
9	you would like the opportunity to review and sign
10	your transcript pursuant to the Federal Rules of
11	Civil Procedure once we provide it to you. Is that
12	correct?
13	A. That is correct.
14	Q. Okay. And we will do so. What's
15	your full name oh, let's let's go through the
16	rules first. Have you ever been involved in a civil
17	deposition before today?
18	A. No.
19	Q. Okay. Just to give you the
20	ground rules, I'm I'm going to be asking you
21	questions, you're going to be giving me answers.
22	A. Uh-huh.
23	Q. We can't talk at the same time
24	because we have a stenographer who's recording our
25	words. So I'll try to prevent myself from

Associated Reporters Int'l., Inc.

Page 9 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 1 2 interrupting you while you're -- while you're 3 answering. And if you could do the same while I'm 4 asking questions that will make for a clearer record. 5 The other thing is, you're nodding and 6 shaking your head right now, if you can try to make 7 your answers verbal, rather -- or instead of saying 8 uh-hum or um-um, say yes or no. Make all the 9 questions -- rather all the answers verbal, that will 10 also make for a clearer record. 11 Α. I can do that. 12 If there is any point during the Q. 13 course of the deposition that you wish to take a 14 break, just let me know. I'll ask that you answer 15 the pending question and then we can break for food, 16 bathroom, whatever the -- the situation may be, you 17 want to talk to your attorney or whatever. 18 Finally, if you don't know something 19 or you're -- don't remember something, it's okay to 20 tell us that. I don't think your attorney wants you 21 to guess. I don't want you to guess. I just want 22 what you know, okay? 23 Α. Okay. 24 Okay. And what's your full name? Q. 25 Α. John Peter Restuccia.

	Page 10
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. And have you ever gone by
3	any other names?
4	A. No.
5	Q. And what's your date of birth?
6	A. July 24th, 1999.
7	Q. And what is your current address?
8	A. 600 Main Street, Vestal, New York
9	13850.
10	Q. Are you did you grow up around
11	here or are you from a a different place?
12	A. I grew up in Vestal, New York,
13	yes.
14	Q. Oh, okay. And how long have you
15	lived at 600 Main Street?
16	A. I've lived there most of my life.
17	I moved away to Arizona for two years for work, and
18	then I just came back six to seven months ago.
19	Q. Okay. Is that your parents'
20	house?
21	A. Yes.
22	Q. Okay. And who do you live with
23	at that house?
24	A. I live with my mother, father and
25	sister, sometimes, when she's back from college.

	Page 11
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. And is it fair to say that
3	the allegations in this complaint, and by this
4	complaint I'm going to hand you what's been marked as
5	Defendants' Exhibit One. This is the verified
6	complaint in this matter.
7	Is it fair to say that the allegations
8	in your complaint complaint of incidents when I
9	say your complaint, I know you're let me let me
10	just put this on the record. You were at the time of
11	the the incidents here in November 2019, a member
12	of the College Republicans, correct?
13	A. I was the president of the
14	College Republicans.
15	Q. Okay. And that's one of the
16	plaintiffs in this case, okay?
17	A. Yes.
18	Q. And and so when I say your
19	complaint, I'm referring to the College Republicans,
20	not you personally, because I know you weren't named
21	as a plaintiff?
22	A. Correct.
23	Q. Okay. So my question was, is it
24	fair to say that the events alleged in this complaint
25	occurred during November of 2019?

	Page 12
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes.
3	Q. At which time you were the
4	president of the College Republicans?
5	A. Yes.
6	Q. Okay. Can you give me and you
7	mentioned there was one in Arizona. Give me all of
8	the addresses you lived at between November, 2019 and
9	present, other than 600 Main Street?
10	A. 815 E Colter Street, Apartment
11	178, Phoenix, Arizona. I don't know the ZIP Code
12	anymore. And that's it.
13	Q. Okay. When did you live there?
14	A. I lived there, I want to say,
15	2021 to 2022.
16	Q. Okay. What were you doing there
17	when you when you lived there?
18	A. I was a manager and community
19	director for a nonprofit 501 (c)(3).
20	Q. What was the name of that
21	nonprofit?
22	A. Look Ahead America.
23	Q. What does Look Ahead America do?
24	A. They were a community organizing
25	group for America First Patriots who helped to

	Page 13
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	register voters.
3	Q. Okay. So voter registration work
4	essentially?
5	A. Essentially with some community
6	organizing putting on events.
7	Q. Okay. Who did you live with at
8	815 Colter Street?
9	A. Myself. That's it.
10	Q. Okay. And during all other times
11	from November 2019 until present, other than the
12	Phoenix address, you lived at 600 Main Street?
13	A. Vestal, New York, yep.
14	Q. Okay. Are you married?
15	A. No.
16	Q. Do you have any children?
17	A. No.
18	Q. Are you currently employed?
19	A. Yes.
20	Q. Where are you employed?
21	A. The Department of Motor Vehicles.
22	Q. D.M.V. Okay. What do you do
23	there?
24	A. I'm a clerk.
25	Q. And when did you start at D.M.V.?

		Page 14
1	B.U. College, et al v Ro	ose, et al - 1/10/23 - J. Restuccia
2	Α.	I started five months ago. About
3	two weeks after I go	ot back from Arizona.
4	Q.	Okay. Are you currently a
5	student?	
6	Α.	No.
7	Q.	Okay. You have been in the past
8	a college student?	
9	Α.	Yes.
10	Q.	Let's talk about your educational
11	history starting wit	th high school.
12	Α.	I got my I got my Regents
13	diploma from Vestal	High School.
14	Q.	Okay.
15	Α.	Then I went to St. Bonaventure
16	for one year.	
17	Q.	What years were those? What year
18	was that?	
19	Α.	2017, I want to say. 2017.
20	Q.	That's where you were a freshman?
21	Α.	Yes.
22	Q.	St. Bonaventure?
23	Α.	Yes.
24	Q.	Okay.
25	Α.	Freshman.

		Page 15
1	B.U. College, et al v Ro	ose, et al - 1/10/23 - J. Restuccia
2	Q.	So you fall 2017?
3	Α.	Yes.
4	Q.	And did you finish the year there
5	or leave early?	
6	Α.	I finished the year there.
7	Q.	So you went there until spring
8	2018?	
9	Α.	Yes.
10	Q.	Where's St. Bonaventure located?
11	Α.	Allegany, New York.
12	Q.	Okay. And then you came back to
13	Vestal after that?	
14	Α.	Yes.
15	Q.	All right. And what did did
16	you you finished	your freshman year there?
17	Α.	I finished my freshman year at
18	St. Bonaventure.	
19	Q.	Okay. And then where did you go
20	to school next?	
21	А.	Binghamton University.
22	Q.	Okay. And what years were you at
23	B.U.?	
24	Α.	20 I want to say 2018 to 2021.
25	Q.	Okay. And just to break it down,

	Page 16
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	you went in fall of 2018 to B.U.?
3	A. I believe that's correct.
4	Q. Okay. And again, I'm only asking
5	what you remember. If you don't know
6	A. Yeah, I've it's with the dates
7	for college, it's a little fuzzy.
8	Q. Fair enough. Were you there in
9	the spring of '19?
10	A. Yes.
11	Q. And I think it's fair to say,
12	based on the allegations in the complaint, you were
13	there in fall of '19, correct?
14	A. Actually, I was not there spring
15	of '19, but I was there fall of '19.
16	Q. Okay. So you're there fall of
17	2018, why are you not there in spring of 2019?
18	A. I did an internship in Washington
19	D.C.
20	Q. Okay. Was that through B.U.?
21	A. There were credits associated
22	with it with B.U., but the internship, I got on my
23	own without any assistance from the university.
24	Q. Okay. And what was the
25	internship?

	Page 17
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I worked at the Leadership
3	Institute, a 501 (c)(3) in Washington D.C. as an
4	intern for the Grassroots Department.
5	Q. Okay. And then you returned to
6	B.U. in fall of '19? Can we agree that the
7	allegations in the complaint here
8	A. Yeah.
9	Q were you president?
10	A. Yes, I was the president first.
11	And then, the next semester, I was at the internship.
12	Q. Okay. Got you. So just so we
13	can break this down
14	A. Uh-huh.
15	Q fall of '19, you're at the
16	Leadership Institute in Washington?
17	A. Fall of '19, no.
18	Q. No, okay. Spring of '19, you're
19	at the Leadership Institute
20	A. Institute, yes.
21	Q in Washington? Fall of '19
22	A. I was here.
23	Q you're back at B.U.?
24	A. Yes.
25	Q. And you were at that juncture

	Page 18
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	for that one semester, you were the president of the
3	College Republicans?
4	A. Yes.
5	Q. Were you the president in spring
6	of 2 2020?
7	A. No.
8	Q. Okay. Were you at B.U. in spring
9	of 2020?
10	A. Online.
11	Q. Did you start the semester going
12	to school here? And just for the record, we're
13	sitting in the conference room at Binghamton
14	University. So that's why I say here. But were you
15	did you start the semester live and in person for
16	classes before COVID hit or were you
17	A. Yes, I was live and in person.
18	Q. Okay. And then the semester
19	ended up like every other college student in America
20	to be a online experience, correct?
21	A. When COVID hit, I was at my
22	internship and then it went all online. So I was
23	only on campus a year-and-a-half at B.U.
24	Q. Got you. Okay. So I'm just
25	trying to understand because maybe I've got it mixed

	Page 19
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	up in my head.
3	MR. CRAIG: Can I clear it up?
4	MR. MOORE: Yeah, of course.
5	MR. CRAIG: Did you have an internship
6	in Washington D.C. in spring 2019, which is before
7	the fall of 2019, or did you have the internship in
8	D.C. in spring of 2020?
9	THE WITNESS: Spring of 2020.
10	MR. MOORE: Okay. It's making more
11	sense now.
12	THE WITNESS: Yes.
13	BY MR. MOORE: (Cont'g.)
14	Q. Okay. So spring of '19, fall of
15	'19, you're at B.U.?
16	A. Yes
17	Q. Okay.
18	A on campus.
19	Q. Some of which is online due to
20	the COVID-19 pandemic?
21	A. No, COVID happened after.
22	Q. Okay. And then you go to
23	Washington?
24	A. Yes.
25	Q. And there your internship is

	Page 20
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	mostly online?
3	A. Yes.
4	Q. Okay. Got you. And then fall of
5	2020, are you back at B.U. or are you elsewhere?
6	A. Fall of 2020, after my
7	internship, I was at B.U. online.
8	Q. B.U. online. They were still
9	online for that semester?
10	A. Yes.
11	Q. Okay. And then, did you ever
12	graduate from B.U.?
13	A. Yes, I did.
14	Q. When did you graduate?
15	A. I believe it was fall 2021.
16	Q. Okay. And what was your G.P.A.?
17	A. Three point two seven, I believe.
18	Q. Okay. And did you do any
19	postgraduate work here?
20	A. No.
21	Q. When you were when you
22	graduated in fall of 2021, that was your your time
23	ended at B.U.?
24	A. My time ended at B.U.
25	Q. Okay. And did you do any

	Page 21
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	postgraduate work else elsewhere?
3	A. No.
4	Q. Okay. I've handed you already
5	what has been marked as a Defendants' Exhibit One.
6	This is the July 22
7	MR. CRAIG: Do you have a copy for the
8	rest of us?
9	MR. MOORE: Oh yeah, of course.
10	Peter, would you like one?
11	MR. SAITTA: Sorry?
12	MS. KURYLUK: Do you want a copy of
13	the complaint?
14	MR. SAITTA: Yeah.
15	MR. MOORE: And I got two more for the
16	rest of you, if you want one. Actually, I'll need
17	one of them.
18	BY MR. MOORE: (Cont'g.)
19	Q. Do you recognize this document,
20	sir?
21	A. I believe it is the case against
22	Binghamton it's the case against Binghamton
23	University put on by YAF, John Lizak and the College
24	Republicans.
25	Q. Okay. You're looking at the

	Page 22
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	cover?
3	A. Yes.
4	Q. My question is, did you did
5	you review this complaint before it was filed?
6	A. Before it was filed?
7	Q. Yes.
8	A. I don't know.
9	Q. Is this the first time you've
10	seen it or have you seen it before today?
11	A. I have seen it before today.
12	Q. Okay. Have you reviewed it
13	before today?
14	A. Yes.
15	Q. Okay. When do you when's the
16	first time you remember reviewing it?
17	MR. CRAIG: And to jump in here, not
18	in any discussions you've had with counsel.
19	BY MR. MOORE: (Cont'g.)
20	Q. And let me make one thing clear
21	before we proceed any further. I am not, now or at
22	any point during this deposition, asking you about
23	any communications you've had with the College
24	Republicans attorney in this litigation.
25	So when I'm asking you if you've

	Page 23
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	reviewed it, I'm just asking, have you read this
3	document before today?
4	A. In general, yes.
5	Q. Okay. All right. And by what
6	do you mean by in general?
7	A. I've
8	Q. Other than speaking to your
9	attorneys about it, have you sat down and read
10	through it?
11	A. Yes.
12	Q. Okay. And when did you sit down
13	and read through it? Again, without asking you about
14	the particulars of any conversations with counsel.
15	A. I looked over it on my lunch
16	break.
17	Q. And lunch break?
18	A. Well, at the D.M.V.
19	Q. Oh, okay. So recently?
20	A. Very recently, yes.
21	Q. Okay. Got you. All right, I
22	hear you. Okay. Is it your belief that the facts
23	and allegations and the verified complaints to the
24	extent you've reviewed it are accurate?
25	A. Yes.

	Page 24
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Again, the as we've
3	mentioned, the caption mentions the Binghamton
4	University College Republicans. What is the
5	Binghamton University College Republicans?
6	A. Can you clarify a little bit, the
7	question?
8	Q. I I'm I'm asking you, this
9	is one of the plaintiffs in this case, correct?
10	A. Correct.
11	Q. And were you a member of that
12	group?
13	A. Yes.
14	Q. Can you tell me what that group
15	was?
16	A. It was a group of college
17	students who identified as conservative or republican
18	who wanted to get together.
19	Q. Do you know when the B.U. College
20	Republicans began as a group?
21	A. No, it was years before my time.
22	Q. Okay. So it existed at the time
23	you came to B.U.?
24	A. Yes.
25	Q. Okay. And when what were your

	Page 25
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	dates of membership in that organization? When did
3	you join?
4	A. I joined my sophomore year, which
5	would've been my first year at Binghamton University.
6	Q. Let's go back to our notes here.
7	The first year at Binghamton University would've been
8	fall 2018, correct?
9	A. Correct.
10	Q. Okay. So you joined in fall of
11	2018, at the beginning of the semester or midway
12	through?
13	A. Beginning of the semester.
14	Q. Okay. And during and were you
15	a member of the B.U. College Republicans until your
16	graduation in fall of 2021?
17	A. No.
18	Q. Okay. What was your period of
19	membership?
20	A. My period of membership was until
21	I left for Washington D.C.'s internship.
22	Q. Okay. So through the end of fall
23	2019?
24	A. Yes.
25	Q. Okay. So you remember, for

	Page 26
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	approximately one year, is that fair to say, a year-
3	and-a-half?
4	A. A year-and-a-half.
5	Q. Okay. And during that time, did
6	you hold any offices with the B.U. Republicans?
7	A. Yes.
8	Q. And what offices office or
9	offices did you hold?
10	A. I held the presidency.
11	Q. And that was for a full year from
12	fall '19 or just what what period did you hold
13	the presidency, let's say?
14	A. I held it for one semester.
15	Q. Okay. And I think from your
16	prior testimony we've already revealed that that was
17	fall of 2019?
18	A. Correct. And the summer
19	beforehand.
20	Q. Okay. So summer of '19?
21	A. Yes.
22	Q. Okay. And how did you get that
23	office?
24	A. I was elected.
25	Q. And when you joined, not when you

	Page 27
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	were elected, when you joined in fall of 2018, how
3	many members did the B.U. College Republicans have?
4	A. It fluctuated greatly, and I
5	didn't attend every single meeting because their
6	meeting structure was a little chaotic because it was
7	run by college students.
8	Q. Yeah. Okay. Can you approximate
9	how many members there might have been when you
10	joined in fall of '18?
11	A. No more than a dozen.
12	Q. Can you name those dozen people
13	who were members when you when you joined?
14	A. No.
15	Q. Okay. Let's talk about when you
16	assumed the presidency in the summer of 2019. First
17	of all, when were you elected to the office?
18	A. The end of my freshman at B.U.,
19	which would've been my sophomore year
20	Q. Okay.
21	A at the very end.
22	Q. So all the members vote, they
23	tally them up and you were you were the president?
24	A. I was elected, yep.
25	Q. Okay. Are there any other

٠	Page 28
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	offices for the B.U. Republicans other than
3	president?
4	A. Yes.
5	Q. Okay. So what are those offices?
6	A. Treasurer, secretary, vice
7	president.
8	Q. Okay. Who was the president when
9	you were elect when you when during your
10	first semester there, do you know?
11	A. Chris Demarco.
12	Q. Okay. And was Chris part of the
13	group when you were president?
14	A. No, he had graduated.
15	Q. Okay. So he graduated at the
16	at the end of the '18/'19 school year?
17	A. Uh-huh.
18	Q. And who was the treasurer when
19	you joined?
20	A. I don't remember.
21	Q. Who was the secretary when you
22	joined?
23	A. I don't remember.
24	Q. Who was the V.P. when you joined?
25	A. Don't remember.

	Page 29
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Fair enough. So the next
3	semester, you are the president?
4	A. Yeah.
5	Q. Who's the treasurer when you were
6	president?
7	A. Brian Murray.
8	Q. And do you keep in contact with
9	Brian?
10	A. Yes.
11	Q. Okay. Do you have his contact
12	information?
13	A. I do, yeah.
14	Q. Okay. Can you tell us what it
15	is, beginning with phone number?
16	A. I don't have his phone number. I
17	have his Facebook. That's how we mostly communicate.
18	Q. Okay. Do you have his physical
19	address?
20	A. Not off the top of my head, no.
21	I can drive to it, but I can't
22	Q. Is he a local?
23	A. Yes.
24	Q. Okay. Can you get that
25	information provided to your attorney

	Page 30
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes, I can.
3	Q of Brian Murray?
4	A. Yeah.
- 5	MR. MOORE: So I'm I'm going to
6	make a request on the record for Brian Murray's
7	address.
8	BY MR. MOORE: (Cont'g.)
9	Q. Who was the secretary at the time
10	of your presidency?
11	A. We didn't have one at that time -
12	-
13	Q. Okay.
14	A when I was elected.
15	Q. Did someone assume that's the
16	the secretaryship during your your reign as
17	president?
18	A. Yes.
19	Q. Who who was that person?
20	A. I don't remember if it was Jon
21	Lizak or Preston Scagnelli. One of those two.
22	Q. Okay. Who is Preston Scaganelli
23	(sic)?
24.	A. Preston Scagnelli was one of the
25	club members when I was president of College

		Page 31
1	B.U. College, et al v R	ose, et al - 1/10/23 - J. Restuccia
2	Republicans and one	who I worked very closely with.
3	Q.	Okay. Do you have Preston's
4	current contact inf	ormation?
5	A.	Yes, on my phone.
6	Q.	Okay. Can you provide that to
7	us?	
8	A.	Can I go get my phone?
9	Q.	Sure.
10	A.	Let me know when you're ready.
11	Q.	I'm ready. It's all being
12	recorded anyway, so	
13	A.	Okay.
14	Q.	if I don't write it down in
15	time	
16	Α.	Okay.
17	Q.	I'll have it anyway.
18	A.	Okay. Five one eight two five
19	zero eight four eig	ht five.
20	Q.	Do you know where Preston lives?
21	A.	Saratoga Springs.
22	Q.	may get back to Saratoga. Do
23	you have his addres	s?
24	Α.	No.
25	Q.	Okay. Who was the V.P. at your

	Page 32
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	time of presidency?
3	A. Rein Bay.
4	Q. R-E-I-N B-A-Y?
5	A. Yes.
6	Q. Okay. And Rein is still a
7	student here, is that correct?
8	A. To the best of my knowledge,
9	yeah.
10	Q. Okay. Do you have Rein's current
11	address?
12	A. No.
13	Q. Do you have Rein's current phone
14	number?
15	A. No.
16	Q. Do you maintain contact with Rein
17	at all?
18	A. Last time I talked to Rein was
19	maybe two months ago over Instagram.
20	Q. Okay.
21	MR. MOORE: That's the current College
22	Republican president?
23	MR. CRAIG: I believe, yeah.
24	MR. MOORE: So I believe we've already
25	asked for that deposition.

	Page 33
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. CRAIG: Yeah.
3	THE WITNESS: I believe Logan Blanski
4	(sic throughout) is president.
5	MR. MOORE: Oh
6	MR. CRAIG: One of them is the
7	THE WITNESS: Vice president.
8	MR. CRAIG: V.P
9	THE WITNESS: Yeah.
10	MR. CRAIG: and one is the
11	president. But we can
12	MR. MOORE: Yeah.
13	MR. CRAIG: correspond on that.
14	MR. MOORE: We'll figure that out.
15	BY MR. MOORE: (Cont'g.)
16	Q. Okay. So you were the president
17	for one semester, is that correct?
18	A. Yes.
19	Q. And then you took off to
20	Washington?
21	A. I got an internship, so I took
22	the opportunity.
23	Q. Got you. I hear you. Okay. Did
24	the group hold regular meetings during your time as a
25	member of the College Republicans? I think you had

	Page 34
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	already referenced there was a chaotic meeting
3	schedule during your first semester there.
4	A. Yes, I took the reins and I made
5	pretty consistent meetings.
6	Q. Okay. So in fall of 2019, what -
7	- what what was the meeting scheduled?
8	A. I don't remember.
9	Q. What was the meeting's frequency?
10	Tell me what you know about the regularity of those
11	meetings.
12	A. I don't remember. Maybe once
13	every two weeks.
14	MR. CRAIG: To be clear, are you
15	confident of that or are you
16	BY MR. MOORE: (Cont'g.)
17	Q. You're guessing?
18	A. Yeah, I'm guessing.
19	Q. Okay.
20	A. Yeah.
21	Q. That's fine. That's all right.
22	Were they in-person meetings, online
23	meetings?
24	A. In-person meetings.
25	Q. Okay. And where were they held?

	Page 35
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. On the campus.
3	Q. You would reserve a room and
4	A. Yes.
5	Q meet there? Okay. Got you.
6	And was that using the Be There reservation system?
7	A. I don't remember how I reserved
8	the rooms.
9	Q. Okay. That's fair enough. Are
10	regular minutes or any other records maintained
11	recording regarding those meetings?
12	A. No minutes, but I made sure to
13	keep a list of people who attended the meetings.
14	Q. Do you still maintain that list?
15	A. No.
16	Q. Does do the College
17	Republicans maintain that list?
18	A. I don't know.
19	Q. Okay. And there was no recording
20	made or was there a recording made of those meetings?
21	A. No recording.
22	Q. Okay. So you didn't video it
23	any, you didn't record it audibly
24	A. No.
25	Q anything like that?

	Page 36
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. No.
3	Q. And there were no minutes?
4	A. No.
5	Q. Okay. During the fall of 2019,
6	prior to the Laffer event, do you know what I
7	referred to as the Laffer event?
8	A. Yes.
9	Q. And do you know what I refer to
10	as the tabling event?
11	A. Yes.
12	Q. Okay. Prior to the tabling
13	event, did the College Republicans hold any events
14	during your presidency on campus?
15	A. Yes.
16	Q. Okay. How many?
17	A. We every meeting we tried to
18	get a speaker to show up, get him to attend, so there
19	were always those, we had smaller speakers. And then
20	we also had a panel discussion called the case
21	against socialism.
22	Q. Okay. Okay. And we'll talk in
23	more detail about that. During your spring 2018
24	semester, when you first came here and when you first
25	joined the College Republicans, were there any events

	Page 37
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	during that period?
3	A. Not that I can remember for
4	College Republicans.
5	Q. And then did you have any
6	membership in the group after you left the
7	presidency?
8	A. What do you mean by that? I'm
9	looking for
10	Q. Were you a member of the College
11	Republicans after you returned from Washington?
12	A. No.
13	Q. Okay. Do you still receive
14	emails, information or communications from the
15	current College Republicans?
16	A. Right now?
17	Q. Yeah.
18	A. Once in a while, yes.
19	Q. How do you receive those
20	communications?
21	A. I receive an Instagram text.
22	Q. Is that from the College
23	Republicans or somebody within the group?
24	A. Someone within the group.
25	Q. Okay. Who do you maintain

	Page 38
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	contact with from the College Republicans?
3	A. Once every maybe three months,
4	I've talked to Rein to just check up how she's doing,
5	how's school going.
6	Q. Okay. So you keep in contact
7	with Rein from the current group. Anyone else, you
8	mentioned Logan?
9	A. Logan Blanski, her boyfriend, I
10	talk to because talk to one, it's kind of like you
11	talk to both.
12	Q. Okay.
13	A. So but that's very sparse
14	communication.
15	Q. Okay. So other than you, Brian,
16	Rein, Jon Lizak and Preston Scaganelli (sic), were
17	there any other members of the College Republicans
18	during your presidency in fall of 2019?
19	A. Yes, there were more members.
20	Q. How many
21	A. Yeah.
22	Q how many members?
23	A. It fluctuated because it is a
24	college club. But at our height we had twenty-two.
25	Q. That's during your presidency?

	Page 39
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes.
3	Q. Do you re maintain a list of
4	those names?
5	A. No.
6	Q. And other than the individuals
7	we've already mentioned, were all of those
8	individuals members during that time, presumably Jon
9	and Preston were, correct?
10	A. Yes.
11	Q. And were Brian and Rein at that
12	time?
13	A. Brian showed up very sporadically
14	and Rein showed up maybe once every six meetings
15	because of her schedule. So they didn't really
16	attend meetings, but they were considered club
17	members.
18	Q. Okay. Other than those four and
19	you, were there any other members whose names you
20	remember?
21	A. Lacey Kestager.
22	Q. Okay.
23	A. Bryn Lauer.
24	Q. Can you spell that just a
25	A. L-A-U-E-R, I believe.

	Page 40
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Bryn is B-R-I-N?
3	A. B-R-Y-N, yes.
4	Q. Got you. Okay. Anyone else?
5	A. I don't remember Spencer's last
6	name off the top of my head, but we are Facebook
7	friends.
8	Q. Can you provide that to your
9	attorney?
10	A. Yes.
11	Q. Okay. Anyone else whose name you
12	remember during the period of your presidency?
13	A. Joe Baba I can't pronounce the
14	Italian last name, but Babadina. Again, I believe
15	we're Facebook friends.
16	Q. Okay. Can you provide that to
17	your
18	A. Yes.
19	MR. CRAIG: And John, just at the end
20	of this or when the transcript comes in, if you can
21	send
22	MR. MOORE: I'm trying to keep notes
23	and
24	MR. CRAIG: Yeah.
25	MR. MOORE: I'll send you an email.

	Page 41
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. CRAIG: Yep. Thank you.
3	THE WITNESS: Spencer Hayes was the
4	name.
5	BY MR. MOORE: (Cont'g.)
6	Q. Hayes?
7	A. Hayes, H-A-Y-E-S.
8	Q. Hayes. Okay. And I'm going to
9	ask for addresses to the extent known of these
10	people.
11	MR. CRAIG: We can provide whatever is
12	
13	THE WITNESS: Whatever's on Facebook.
14	BY MR. MOORE: (Cont'g.)
15	Q. Okay. Other than Joe Baba
16	whatever, who's the next person that you remember?
17	A. Yeah, I I don't remember.
18	Q. Okay. How did you communicate
19	with this group of twenty-two College Republicans
20	members in 2019? And and when I say how did you
21	communicate, was it phone calls, was it group chats,
22	was it texts, social media, emails? I'm not trying
23	to eliminate any one platform.
24	A. Absolutely. Mostly I talked to
25	them in person and over the phone. And then the

	Page 42
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	second way, we had a, I believe a GroupMe at one
3	point, which is a group chat texting service. And
4	then we also used our Facebook page, which was one of
5	our bigger ones. And we used the College Republicans
6	email.
7	Q. Okay. So if you're a College
8	Republicans member, do you have an email address
9	through the College Republicans?
10	A. No, we have their student emails.
11	They sign up with their student emails and we send
12	out a mass mail.
13	Q. So you as president would send
14	emails under that, the C.R. Republicans email
15	address?
16	A. Sometimes I would, sometimes it
17	would be one of the other club members when I got
18	busy and needed them to.
19	Q. Fair enough. Okay. This
20	GroupMe, excuse me, because, you know, I'm old. What
21	can you explain to me what GroupMe is?
22	A. It's just a texting service that
23	specific texting app where you can just put people
24	into a group.
25	Q. Okay. Do you maintain the text

	Page 43
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
-2	from the GroupMe, I guess text chains that existed in
3	fall of 2019?
4	A. I don't know if I still have
5	them. They were on my old phone, and I've been
6	through like three phones by now.
7	Q. Got you. I'm going to ask to see
8	if you can access those and provide copies to your
9	attorneys?
10	A. Okay.
11	MR. MOORE: And what I'm asking for is
12	a full copy of all College Republican communications
13	through GroupMe. I'm also going to request the
14	College Republicans Facebook messages or emails sent
15	during the fall 2019 semester.
16	And by fall of 2019, I'm talking about
17	the period of Mr. Restuccia's presidency, which began
18	during the summer and extended until the end of the
19	semester.
20	MR. CRAIG: So John, just to make sure
21	I'm on the same page, the the C.R. email is
22	university run.
23	MR. MOORE: Yes.
24	MR. CRAIG: So
25	MR. MOORE: Which that's something

	Page 44
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	that Kevin may want to address. We may need an
3	authorization to access those.
4	MR. CRAIG: Okay. We can.
5	MR. MOORE: I I'm pretty sure I.T.
6	can get them.
7	MR. CRAIG: Yeah.
8	MR. MOORE: But I don't think it's the
9	university's practice to grab someone's emails
10	without their consent. So I'm going to ask for an
11	authorization from that organization as well as Mr.
12	Restuccia's B.U. email address, Mr. Lizak's B.U.
13	email address and Ms. Kestager's B B.U. email
14	address. And if possible, I'd like to get Lizak and
15	Kestager's before they appear for deposition.
16	MR. CRAIG: Yeah.
17	MR. MOORE: You know, they I think
18	we have a February date for Kestager.
19	MR. CRAIG: Yeah, I'm just thinking
20	through this. We may want to review those, just
21	MR. MOORE: Sure.
22	MR. CRAIG: I doubt there's any
23	privileged stuff
24	MR. MOORE: Absolutely.
25	MR. CRAIG: but

	Page 45
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. MOORE: I think the thing
3	MR. CRAIG: we may need them from
4	you in order to go through them.
5	MR. MOORE: I think it would make
. 6	sense to get the authorizations. We get them as soon
7	as possible. We provide them to you before the
8	witnesses are produced. You have an opportunity to
9	re to review them and then we we partake in the
10	depositions. If that make sense.
11	MR. CRAIG: Yeah, we can we can
12	email and figure it out.
13	MR. MOORE: Yeah. We'll figure it
14	out. I just want to put it on the record that we're
15	requesting it.
16	BY MR. MOORE: (Cont'g.)
17	Q. Okay. Back to Mr. Restuccia.
18	Let's go to the complaint, and I'm going to ask you
19	to turn to there are numbered paragraphs. So
20	A. Okay.
21	Q I'm going to ask you to go to
22	page four of seventy five.
23	A. Okay.
24	Q. And I'm going to direct your
25	attention to numbered paragraph twelve.

	Page 46
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Uh-huh.
3	Q. And then I'm going to read it
4	into the record. It reads, "Plaintiff Binghamton
5	University College Republicans, in parentheses,
6	College Republicans, is an expressive, registered but
7	suspended student organization at the State
8	University of New York at Binghamton." And then in
9	parenthesis, it says, "SUNY Binghamton and an
10	unincorporated association of SUNY Binghamton
11	students. It has approximately ten twenty
12	members." Did I read that correctly?
13	A. Yes.
14	Q. What does the word "expressive"
15	mean in the context to this paragraph?
16	A. I don't know.
17	Q. Okay. Is it accurate that the
18	B.U. Republicans are currently suspended as a student
19	organization?
20	A. I don't know their current
21	status.
22	Q. Do you know who the current
23	president is?
24	A. I believe it's Logan Blanski.
25	Q. Okay. So is it fair to assume

	Page 47
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	that if Logan is a current president that it is a
3	functioning entity, or don't you know?
4	A. I don't know.
5	Q. Okay. Was the College
6	Republicans ever suspended?
7	A. The right to book rooms and to
8	put on events and table was suspended, yes.
9	Q. Okay. And do you know if that
10	right to book rooms and table was ever restored?
11	A. I don't know.
12	Q. Okay. You weren't a member after
13	the end of fall 2019, correct?
14	A. Correct.
15	Q. Okay. Let's go to paragraphs
16	thirteen and fourteen. It starts at the bottom of
17	that page four seventy five of Exhibit One and then
18	it proceeds onto the next page. I'll read it into
19	the record. "The purpose of College Republicans is
20	to make known and promote the principles of the
21	Republican Party amongst members of the SUNY
22	Binghamton campus and community. To aid in the
23	election of Republican candidates at all level of
24	government. To encourage and assist in the
25	organization an active functioning of the Republican

	Page 48
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Party at local, state and national levels, and to
3	develop political skills and leadership abilities
4	among Republican students as preparation for future
5	serviced by them to the Republican party community."
6	Paragraph fourteen, "College
7	Republicans achieves this purpose primarily by being
8	an expressive organization. It engages in a wide
9	variety of expressive activities, including posting
10	flyers and signs, hosting tables with information,
11	inviting speakers to campus and talking with fellow
12	students about Republican Party principals." Did I
13	read those two paragraphs correctly?
14	A. Yes.
15	Q. Okay. Let's focus on paragraph
16	fourteen.
17	A. Okay.
18	Q. And it references the word
19	"events." Well, I'm going to use the word events
20	just to to as as a general umbrella. Okay?
21	From the time you joined the B.U. Republicans in
22	spring of 2019, up to and including November of 2019,
23	when the tabling and Laffer events occurred, had the
24	B.U. Republicans hosted or held any event or events
25	on campus?

	Page 49
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. CRAIG: Objection. Asked and
3	answered. But you can answer again.
4	MR. MOORE: But yeah, I know he's
5	talked about the case against socialism, but.
6	MR. CRAIG: Go ahead you can go
7	ahead and answer.
8	THE WITNESS: We had participated on
9	the Binghamton University Club Fair Day and we had
10	our meetings. We had the case against socialism, as
11	I stated previously.
12	BY MR. MOORE: (Cont'g.)
13	Q. Okay. And during your time
14	there, whether as president or otherwise, were there
15	any other events that you recall?
16	A. Not that I can remember.
17	Q. Okay. And this is up until the
18	Laffer came?
19	A. Correct.
20	Q. All right. What's the Club Fair
21	Day?
22	A. Club Fair Day is when everyone on
23	the university who's a club gets a table, they go
24	outside one of the first days of the new semester and
25	all the students who come can kind of walk around,

	Page 50
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	see what clubs are available, they can sign up and do
3	different things.
4	Q. Got you. Was there one of those
5	Club Fair Days in spring of 2019, which was your
6	first semester there? What was your first your
7	first time as College Republican was spring of 2019?
8	A. No, it was fall.
9	Q. Fall of '18. Okay. Well, let's
10	go back to fall of '18. During fall of '18, was
11	there a Club Fair Day that you were aware of that the
12	College Republicans participate participated in?
13	A. I don't remember.
14	Q. Okay. During the spring of 2019,
15	was there a Club Fair Day that the College
16	Republicans participated in?
17	A. I don't know.
18	Q. Okay. During your presidency in
19	the fall of 2019, was there a Club Fair Day that the
20	College Republicans participated in?
21	A. Yes.
22	Q. Okay. And did you participate in
23	that?
24	A. Yes.
25	Q. Where was it held?

	Page 51
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. It was held outside the main
3	university building where the where the
4	marketplace is right outside there in the central
5	location on campus.
6	Q. Okay. And you were were you
7	at that table?
8	A. Yes.
9	Q. All right. And did the
10	university prevent you from hosting that table at
11	all?
12	A. So I had to work between two
13	tables next to each other, the College Libertarians
14	and the College Republicans.
15	Q. Okay.
16	A. One of those tables did not get
17	tabling rights, but they still set up a table anyway.
18	And
19	Q. Was that the Libertarians?
20	A. I don't remember which one it
21	was, but one of those two was. And we inflated a
22	giant beach ball and had a free speech ball.
23	Q. Okay. Do you have any records
24	that would show whether the College Republicans had a
25	table at Club Fair Day?

	Page 52
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't know. I don't know.
3	Q. Who who else was at that
4	tabling?
5	A. Marlene Astov (phonetic
6	spelling). She was a field rep for the organization,
7	the Leadership Institute, and Rein Bay.
8	Q. Was Rein Bay a member of she
9	was a member of the College Republicans the fall of
10	2019, you've already said, correct?
11	A. Correct.
12	Q. Was she a member of the College
13	Libertarians?
14	A. It's hard to say because there
15	was a lot of crossover with the clubs, and College
16	Libertarians was a very loosely run club.
17	Q. Okay. Were you a member of the
18	College of Libertarians?
19	A. I was the president of the
20	College Libertarians.
21	Q. Okay. Was that a registered
22	student group at the time?
23	A. Yes.
24	Q. Okay. And what you said one
25	of those two groups was not approved to table?

	Page 53
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Correct.
3	Q. Okay. And how do you know that?
4	A. I remember running around trying
5	to get permission that day, if I remember correctly,
6	to try to get a table for both clubs and only one of
7	the clubs was allowed.
8	Q. Okay. And who told you only one
9	of the clubs was allowed?
10	A. I don't remember.
11	Q. Was it the S.A. or was it someone
12	from the university?
13	A. I don't remember.
14	Q. Okay. Do you know who provided
15	approval to whatever group tabled?
16	A. I don't know who did the approval
17	process for tabling.
18	Q. And what was the approval
19	process? Was this done by phone, in person; on
20	email, via Be There or something else?
21	A. I don't remember.
22	MR. MOORE: Okay. If you have any
23	other information, Hamilton, regarding that, I'd
24	appreciate it.
25	MP CPAIC. We can check

	Page 54
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	BY MR. MOORE: (Cont'g.)
3	Q. Meetings, we've already talked
4	about meetings for the College Republican. They
5	they occurred with some regularity during the
6	A. Uh-huh.
7	Q semester. And you had
8	speakers at those meetings?
9	A. Yes.
10	Q. Okay. And do you remember the
11	names of any of the speakers at the meetings?
12	A. We had we had a Michael
13	Vasquez. We had some of the local republican leaders
14	in our area who helped with the party. So Carl Eric
15	Bernhardson (phonetic spelling), Chris Dzeic, had
16	attended one or two meetings.
17	Q. Okay. So let let's get the
18	spelling of those names just so the stenographer has
19	them.
20	THE REPORTER: Yes.
21	BY MR. MOORE: (Cont'g.)
22	Q. Michael Vas
23	A. V-A-S-Q-U-E-Z.
24	Q. Okay. And who is Michael
25	Vasquez?

	Page 55
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Michael Vasquez is a local
3	conservative political commentator.
4	Q. Does he hold a podcast or
5	something like that?
6	A. He has a YouTube channel called
7	No Soundbites Allowed.
8	Q. Okay. Other than Michael
9	Vasquez, you mentioned some other names of speakers
10	who appeared?
11	A. Carl Eric Bernhardson had done
12	volunteer work for the Republican Party in one one
13	of their major volunteers, so he was in contact to
14	the local G.O.P.
15	Q. Okay. And these individuals
16	appeared at one meeting each?
17	A. One meeting or so yes.
18	Q. Other than Carl and Michael, any
19	other speakers?
20	A. Chris Dzeic.
21	Q. Chris, C-H-R-I-S?
22	A. D-Z-E-I-C, I believe it is. We
23	are Facebook friends.
24	Q. Okay. And who is Chris Dzeic?
25	A. He is a one of the local

	Page 56
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	G.O.P. elected committee members for the county.
3	Q. Okay. We've talked about
4	Michael, Carl and Chris as speakers at your event
5	at your meetings. Any others?
6	A. We had one woman, I only know her
7	as Mrs. Lewis (phonetic spelling) because I went to
8	school with her daughter and she gave a she ran
9	for office previously for the local assembly
10	district, and she gave us a presentation on fracking.
11	Q. Okay. Any other speakers that
12	semester?
13	A. Yes, Morgan Zegers.
14	Q. Spelled Zegers?
15	A. $Z-E-G-E-R.$
16	Q. Morgan Zeger, who is Morgan
17	Zeger?
18	A. She runs she used to run the
19	organization, Young Americans Against Socialism. I
20	don't know if she still is now. She currently works
21	for Turning Point U.S.A. though.
22	Q. Okay. So that's Michael, Carl,
23	Chris, Mrs. Lewis and Morgan. Any other individuals
24	make appearance at meetings during the semester?
25	A. George Phillips.

	Page 57
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Who is George Phillips?
3	A. George Phillips is a four-time
4	congressional candidate and has lost all those times,
5	and he's a local conservative politician.
6	Q. Okay. Michael, Carl, Chris, Mrs.
7	Lewis, Morgan and George. Any other speakers during
8	that semester other than Dr. Laffer?
9	A. Not that I can think of.
10	Q. Okay. Do you remember when
11	Michael appeared on campus and met with you? Michael
12	Vasquez?
13	A. Me and Michael had been friends
14	for a long time, so I met with him he came to a
15	number of club meetings.
16	Q. Okay.
17	A. And previously, we had known each
18	other from an event I put on the previous year for
19	College Libertarians.
20	Q. Okay. Carl, when when did he
21	appear?
22	A. I have no idea.
23	Q. Okay. And do you know when Chris
24	appeared?
25	A. Don't know.

	Page 58
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Do you know when Mrs. Lewis
3	appeared?
4	A. Don't know.
5	Q. Do you know when Morgan appeared?
6	A. Yes, on the date of the case
7	against socialism.
8	Q. So that was in October of 2019?
9	A. I don't remember the exact day
10	for the case against socialism.
11	Q. So there was a meeting and then
12	also the case against socialism or did she appear at
13	the case against
14	A. She just appeared at the case
15	against socialism.
16	Q. Got you. And finally George
17	Phillips. When did he appear at the College
18	Republicans group meeting?
19	A. I don't remember. He had showed
20	up a number of times, if I remember correctly.
21	Q. As a speaker?
22	A. As a speaker, yes.
23	Q. Okay. Got you. Were any of
24	those after the Dr. Laffer event?
25	A. No, not that I can recall.

	Page 59
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Dr. Laffer event was near
3	the end of the semester, is that correct?
4	A. Correct.
5	Q. All right. Did you have any
6	meetings after the Dr. Laffer event?
7	A. Yes.
8	Q. Okay. Was there a speaker at
9	that meeting?
10	A. No.
11	Q. How many meetings did you have
12	after the Dr. Laffer event?
13	A. I don't remember.
14	Q. How many meetings did you have
15	before the Dr. Laffer event?
16	A. I don't remember.
17	Q. Okay. Does any other than
18	you've described, any other paperwork or records
19	exist regarding the any of these meetings or the
20	speakers?
21	A. Not that I can recall.
22	Q. How were the speakers booked for
23	one of?
24	A. I called them.
25	Q. Okay. No email requests, no

	Page 60
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. No emails, no. I believe I
3	called them. To the best of my recollection, I
4	called them.
5	Q. Did the university have any
6	involvement in approving or disapproving the
7	appearance of any speaker at the College Republicans
8	meetings?
9	A. No.
10	Q. Okay. You didn't consult with
11	him, they didn't weigh in?
12	A. No.
13	Q. Okay. Your involvement with the
14	College Republicans after the Laffer event was only
15	for the balance of that semester?
16	A. Can you
17	Q. Dr. Laffer appeared on November
18	18th, 2019, correct?
19	A. Correct.
20	Q. Is when he came on campus?
21	A. Uh-huh.
22	Q. You were the president of the
23	College Republicans for the rest of that semester.
24	Is that correct?
25	A. Correct.

	Page 61
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. All right. And then you left for
3	Washington the following semester?
4	A. Correct.
5	Q. Okay. So you do you have any
6	knowledge regarding any events held by the College
7	Republicans after November 2019?
8	A. Yes, I did hear someone
9	reached out to me about Congressman Reed Tom Reed
10	
11	Q. Okay.
12	A coming to campus, and I
13	directed them to the current president.
14	Q. There was an allegation in the
15	complaint that Congressman Reed appeared sometime in
16	early 2020? You don't
17	A. I don't I don't know. I
18	wasn't on campus at the time. I don't know when he
19	appeared.
20	Q. Okay. Did you have any other
21	involvement or did you have a do you have any
22	any other knowledge regarding any events held by the
23	College Republicans after the Laffer event of 2000
24	November 2019?
25	A. Once in a while I call maybe the

	Page 62
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	club President, Jon Lizak or Lacey Kestager or
3	President Scagnelli to check up how they were doing,
4	how the club was doing, but that's the extent of it.
5	Q. Okay. But that wasn't my
6	question. My question was, are you aware whether any
7	events were held by the College Republicans on campus
8	after Dr. Laffer?
9	A. I'm not aware.
10	Q. During your presidency or during
11	someone else's presidency? Okay. So they might have
12	had one, they might not have had one, you just don't
13	know?
14	A. I don't know.
15	Q. Okay. And you haven't attended
16	any College Republican events on campus since your
17	presidency ended?
18	A. No.
19	Q. And how many College Republican
20	meetings occurred after the Laffer event?
21	MR. CRAIG: Objection. Asked and
22	answered. But you can
23	MR. MOORE: I I think you said,
24	there there was that you did meet after that.
25	I'm just asking how many?

	Page 63
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	THE WITNESS: I don't know.
3	MR. MOORE: Okay.
4	BY MR. MOORE: (Cont'g.)
5	Q. There's at least one?
6	A. At least one, yeah.
7	Q. Got you. Paragraph fourteen of
8	the complaint, which you have in front of you, also
9	references posting flyers or signs on campus?
10	A. Uh-huh.
11	Q. You see that?
12	A. Yeah.
13	Q. From that the time you joined the
14	B.U. Republicans in fall of 2018 up to and including
15	November of 2019, had the B.U. Republicans posted
16	flyers or signs on campus?
17	A. I don't remember.
18	Q. Okay. From the time Dr. Laffer
19	appeared in November of 2019 until present, are you
20	aware of whether the College Republicans posted any
21	flyers or signs on campus?
22	A. I don't know.
23	Q. This paragraph in front of you,
24	paragraph fourteen, also references hosting tables?
25	A. Yes.

	Page 64
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. And it says, "hosting tables with
3	information." And also, I'll refer you to another
4	paragraph. This is paragraph forty-five. And I'll
5	read that into the record since we're talking about
6	tables.
7	A. What pages is it on?
8	Q. I'm getting there. I think it's,
9	like it is on page twelve. It's paragraph forty-
10	five.
11	This says well forty-four says
12	paragraph forty-four of Exhibit One says, Plaintiffs'
13	College Republicans regularly engage in expressive
14	political activities on campus." Paragraph forty-
15	five reads, "These political activities include
16	periodically tabling on campus. Student
17	organizations table by setting up a folding table in
18	high traffic area on campus to interact with students
19	for event promotion, organization recruitment and
20	information share." Did I read that correctly?
21	A. Correct.
22	Q. Okay. From the time you joined
23	the B.U. Republicans in fall of 2018 up to and
24	including November of 2019, had the B.U. Republicans
25	hosted any tables with information as described in

	Page 65
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	paragraphs fourteen and forty-five of the complaint?
3	A. Yes.
4	Q. Okay. What was the first one you
5	remember?
6	A. I believe the first one I
7	remember is Constitution Day.
8	Q. When is Constitution Day held?
9	A. I don't know, it's on National
10	Constitution Day.
11	Q. Was this in spring rather in
12	fall of 2018?
13	A. Yes, I believe so.
14	Q. So some you don't remember the
15	exact date, but it was whatever Constitution Day is
16	
17	A. It fell on that year.
18	Q. Okay. Where on campus was the
19	tabling located?
20	A. The tabling was located on the
21	spine.
22	Q. Okay. What is the spine?
23	A. The spine is a central location
24	where students go from Library Tower to the lecture
25	halls to the marketplace.

	Page 66
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Does any paperwork or
3	records exist regarding this Constitution Day tabling
4	during the fall of 2018?
5	A. I don't remember.
6	Q. Was there advertising,
7	reservation confirmation, planning documents, records
8	of the event, anything like that?
9	A. I don't remember. We might have
10	had some photographs taken.
11	Q. Okay. Do you maintain those
12	photographs?
13	A. They might be on the Facebook, I
14	don't remember.
15	Q. Okay. Did you make any kind of
16	reservation or reserve any space for that tabling?
17	A. I don't remember.
18	Q. Was there any kind of requirement
19	rule or guideline for reservation of space on
20	campuses on campus as regards to tabling?
21	A. Yes.
22	Q. Okay. What was the process?
23	A. I don't remember.
24	Q. Would it have to be done online?
25	Would you have to speak to someone, how is it done?

	Page 67
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't remember.
3	Q. Had you ever done it?
4	A. I had.
5	Q. Okay. How many times had you
6	reserved a table?
7	A. I don't remember.
8	Q. Okay. Was it once, was it more
9	than once?
10	A. I don't remember.
11	Q. Okay. You done it at least once?
12	A. I would believe so.
13	Q. Okay. Was that before the
14	November 2019 tabling event?
15	A. I don't remember.
16	Q. Okay. Did you reserve any tables
17	after the Laffer event?
18	A. Not that I'm aware of.
19	Q. Okay. So is it fair to say that
20	you had reserved a table at least once before
21	November 2019?
22	A. Again, I don't remember.
23	Q. Okay. But you had done it at
24	least once, correct?
25	A. I believe so.

	Page 68
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. And you don't remember
3	doing it after the November of 2019?
4	A. I don't remember, no.
5	Q. You were only there for about a
6	month, right, after that?
7	A. Uh-huh.
8	Q. Semester ended sometime in
9	December of 2019?
10	A. Uh-huh.
11	Q. Is it fair to say that you hadn't
12	reserved any tables after the Laffer event?
13	A. Yes.
14	Q. Okay. So necessarily, if you've
15	done it at least once you reserved at least one table
16	before the Laffer event, correct?
17	A. I believe so.
18	Q. Okay. But you don't remember how
19	many times you did that?
20	A. No.
21	Q. All right. And you don't
22	remember what the process was?
23	A. No.
24	Q. Okay. Were you prevented at all
25	by anyone from tabling on the Constitution Day?

	Page 69
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. No.
3	Q. Okay. What's the next tabling
4	you remember that the College Republicans held on
5	campus after Constitution Day in 2018?
6	A. I believe it was the tabling
7	event for Dr. Laffer's event coming up.
8	Q. So November of 2019, according to
9	the complaint on November 14th of that month, there
10	was a tabling event which is discussed in greater
11	detail in the complaint?
12	A. Yes.
13	Q. Okay.
14	A. That's the next one that I
15	remember.
16	Q. Okay. So is it fair to say that
17	if you reserved a table at least once before the
18	November 2019 Laffer tabling, then that would have
19	been the Constitution Day tabling?
20	A. Again, I don't remember if we
21	booked a table for the Constitution Day event.
22	Q. Okay.
23	A. But
24	Q. So there might have been another
25	tabling?

	Page 70
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't remember.
3	Q. Okay. From November of 2019, and
4	by that I mean after the Laffer event, until the
5	present time, do you know if the B.U. Republicans
6	hosted tables with information?
7	A. Can you repeat the question?
8	Q. From November of 2019, which is
9	the date of the Laffer event
10	A. Uh-huh.
11	Q until the present time, do you
12	know if the B.U. Republicans have hosted tables with
13	information?
14	A. I don't know.
15	Q. You weren't involved in any?
16	A. Not that I'm no.
17	Q. Okay. So I believe you've
18	covered this. But I'm going to ask again, just to be
19	clear. From the time you joined the College
20	Republicans in fall of 2018, up to and including
21	November of 2019, when Dr. Laffer spoke, had the B.U.
22	Republicans invited and/or hosted speakers on campus?
23	MR. CRAIG: Objection, asked and
24	answered, but you can answer.
25	MR. MOORE: I'm only asking again,

	Page 71
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	because it sounded like what he described was the
3	lineup of speakers during fall of 2019.
4	MR. CRAIG: Okay.
5	MR. MOORE: But he was a member during
6	spring of 2018. He was a member during fall 2018.
7	BY MR. MOORE: (Cont'g.)
8	Q. My question is, and you can tell
9	me what you've already told me and just say, I've
10	already told you what I know of, but.
11	A. Uh-huh.
12	Q. From the time you joined the B.U.
13	Republicans in fall of 2018, up to and including
14	Laffer's event in November '19, had the B.U.
15	Republicans invited and/or hosted speakers on campus?
16	A. Yes.
17	Q. Okay.
18	A. As I already talked about.
19	Q. You talked about a number of
20	speakers who came during fall of 2019, correct?
21	A. Yes.
22	Q. Were there were any of the
23	were there any other speakers other than that, in
24	your recollection
25	A. Not that I can

	Page 72
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q before you became a pre the
3	president?
4	A. Not that I can remember.
5	Q. Okay. We've talked about the
6	identity of all those speakers that you remember,
7	correct?
8	A. Correct.
9	Q. And those were all at B.U.
10	Republican meetings for the most part, correct?
11	A. Correct.
12	Q. Other than the case against
13	socialism, where you also had a speaker, correct?
14	A. Correct.
15	Q. All right. Were you prevented at
16	all by anyone from hosting any of those speakers you
17	told me about?
18	A. No.
19	Q. Okay. And other than Dr. Laffer,
20	you're not aware of any other speakers the B.U.
21	Republicans have ever brought on campus?
22	A. Not that I'm aware of, maybe in
23	2005, they brought Anne Coulter to campus.
24	Q. Okay.
25	A. But that's

	Page 73
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Got you.
3	A way before my time.
4	Q. Way before your time. You were
5	six years old at the time, yeah. Okay.
6	So from and I'll ask it a slightly
7	different way. From November of 2019, after the
8	Laffer event until the present time, are you
9	personally aware are you anecdotally aware of the
10	B.U. Republicans hosting any speaker of any kind on
11	campus, whether at a meeting, or in some other
12	context?
13	A. Yes. They invited me to speak
14	about some of my experiences in Washington D.C.
15	Q. Did you speak?
16	A. Yes.
17	Q. Okay. Earlier I'd asked you if
18	you had attended was it at a meeting or was it
19	A. It was at a meeting.
20	Q. Okay. Got you.
21	A. Yeah.
22	Q. So you have attended at least one
23	meeting?
24	A. Yeah.
25	Q. Okay. And when was that meeting

		Page 74
1	B.U. College, et al v	Rose, et al - 1/10/23 - J. Restuccia
2	held?	
3	Α.	Couple months ago.
4	Q.	During the calendar year of 2022?
5	Α.	Yes.
6	Q.	Was it during the fall semester
7	of '22?	
8	Α.	Yes.
9	Q.	And who was present at that
10	meeting?	
11	Α.	Either Logan Blanski or Rein Bay.
12	Q.	Were there other members there?
13	Α.	Yes.
14	Q.	How many people?
15	Α.	Maybe six, seven.
16	Q.	Six, seven others other than
17	Logan and Rein?	
18	Α.	Yes.
19	Q.	Do you know any names?
20	Α.	No, not off the top of my head.
21	Q.	Are you the only speaker you're
22	aware of who appea	red on campus at the behest of the
23	College Republican	s after your time as president
24	ended?	
25	А.	Yeah.

	Page 75
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Other than Tom Reed, correct?
3	A. Correct.
4	Q. Okay. You were contacted about
5	Tom Reed, but you weren't present when he spoke?
6	A. Correct.
7	Q. Okay. So you appeared as a
8	speaker last semester, correct?
9	A. Correct.
10	Q. And Tom Reed appeared as a
11	speaker in spring of 2020, correct?
12	A. Correct.
13	Q. Okay. And you're not aware of
14	any other speakers post-dating Dr. Laffer's event?
15	A. I don't know of any speakers, no.
16	Q. Okay. Going back to the caption,
17	which is the first page.
18	A. The first page of the exhibit?
19	Q. Very first page, yeah.
20	A. Okay.
21	Q. Who is Jon Lizak? And the
22	spelling for that is on the caption, but I'll state
23	for the record, J-O-N L-I-Z-A-K.
24	A. What do you mean by who is Jon
25	Lizak?

	Page 76
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Who is he?
3	A. He's he was the successor to
4	me for the College of Republican presidency.
5	Q. Okay. Do you know Mr. Lizak
6	personally?
7	A. Not in the last year year or
8	so. But we knew each other pretty well when we
9	attended Binghamton together
10	Q. Okay.
11	A for that one semester I was
12	there with him during my presidency.
13	Q. So he was there in fall of 2019?
14	A. Yes.
15	Q. And he succeeded you as president
16	in spring of 2020, as far as you know?
17	A. Yes.
18	Q. Were you there when the vote was
19	held to name him as president?
20	A. I believe so.
21	Q. Okay. When is the last time you
22	spoke with Mr. Lizak?
23	A. Six, seven months ago maybe.
24	Q. And what was the context of that
25	conversation?

		Page 77
1	B.U. College, et al v	Rose, et al - 1/10/23 - J. Restuccia
2	Α.	I just asked how he was doing.
3	Q.	Was that a personal conversation
4	or was it online?	
5	Α.	I called him.
6	Q.	Okay. And what did he tell you?
7	What did you disc	iss?
8	Α.	Just how he was doing. How
9	Binghamton was go:	ing.
10	Q.	Okay.
11	Α.	How the club did.
12	Q.	Is he a current B.U. Republicans
13	member?	
14	Α.	I don't know.
15	Q.	Is he still a student of B.U.?
16	Α.	I don't know.
17	Q.	Do you know what years he was a
18	member?	
19	Α.	I don't.
20	Q.	Okay. You know he was a member
21	in fall of 2019?	
22	Α.	That was his freshman year, yes.
23	Q.	And you know he's a member in
24	spring of 2020, co	orrect?
25	Α.	Correct.

	Page 78
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. All right. And you're not sure
3	what membership status he had post-dating spring of
4	'22?
5	A. Post that, no, no idea.
6	Q. Okay. Have you discussed the
7	lawsuit with him, not in the presence of attorneys?
8	A. I don't know.
9	Q. You don't know if you've
10	discussed this lawsuit with him?
11	A. I don't remember if I have or
12	not. We've talked very sparsely over the last two,
13	three years.
14	Q. Okay.
15	A. We kind of lost touch.
16	Q. Are you aware that he made a
17	request to withdraw as plaintiff from this case?
18	A. No.
19	Q. Okay. Do you know you mentioned
20	a name Lacey Kestager?
21	A. Yes.
22	Q. How do you know Lacey?
23	A. Lacey was one of the members when
24	I was president that I was very close to.
25	Q. When's the last time you spoke

		Page 79
1	B.U. College, et al v Ro	ose, et al - 1/10/23 - J. Restuccia
2	with Lacey?	
3	Α.	Probably a year ago.
4	Q.	Is she a current B.U. Republicans
5	member?	
6	Α.	I don't know.
7	Q.	Do you know what year she was a
8	member?	
9	Α.	I don't, other than her freshman
10	year was when I was	president.
11	Q.	So she was a freshman fall '19?
12	Α.	Yes.
13	Q.	And you had no involvement with
14	the group after that	t, so you don't know what her
15	status was postdatir	ng fall of 2019.
16	Α.	Correct.
17	Q.	Is that a fair statement?
18	Α.	That's a fair statement.
19	Q.	Okay. Do you know if she's a
20	current B.U. student	:?
21	Α.	I believe she is not, no.
22	Q.	Do you know when she left B.U.?
23	Α.	No.
24	Q.	Have you discussed this lawsuit
25	with her?	

	Page 80
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Not that I can think of.
3	Q. You never discussed the lawsuit
4	with Lacey?
5	A. Not that I can remember. Most of
6	our calls have been very social over the last like
7	I said, the last time I talked to her was probably a
8	year ago.
9	Q. Okay. She has been identified as
10	a witness to the events alleged in the complaint. Do
11	you have any knowledge of what incidents alleged in
12	this complaint she was a witness to and what the
13	substance of her knowledge is?
14	A. I don't. I can't speak for
15	Lacey. No, I don't know what she I know she had
16	filmed the tabling incident. I know she was present
17	at the Laffer event. That is all I know.
18	Q. Okay. So she was present at the
19	tabling in Laffer events?
20	A. Yes.
21	Q. Okay. I'm going to ask you about
22	some other witnesses who have been identified as
23	plaintiffs' attorneys and is witnesses in this case.
24	And some of them are names you've mentioned before.
25	A. Okay.

	Page 81
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. The first is Logan Blakeslee.
3	A. Blanski.
4	Q. $B-L-A-K-E-S-L-E-E$, is that
5	correct?
6	A. Sounds about right the spelling.
7	Q. Okay. He is a current College
8	Republicans member, is that right?
9	A. Yes.
10	Q. Okay. And what information about
11	the allegations in the complaint, if you know, does
12	Logan have?
13	A. I don't know.
14	Q. Was he at the tabling event?
15	A. I don't remember.
16	Q. Was he at the Laffer event?
17	A. I don't remember.
18	Q. Do you have any personal
19	knowledge whether he has met with plaintiffs'
20	attorneys or any attorneys from their office?
21	A. I don't know. I can't speak for
22	Logan.
23	Q. Are you currently in contact with
24	Logan?
25	A. Last time I talked to him was

	Page 82
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	when he wanted me to come speak on campus.
3	Q. Okay. So you saw him then?
4	A. Yes.
5	Q. Few months ago?
6	A. Yes.
7	Q. Did you discuss the lawsuit at
8	all?
9	A. Not that I'm aware of, no.
10	Q. Okay.
11	MR. MOORE: And I think we've already
12	requested his address and phone number, may be a
13	witness at some point.
14	MR. CRAIG: Yeah, I think.
15	BY MR. MOORE: (Cont'g.)
16	Q. Another name I seen here is Kyle
17	Nelson.
18	A. Uh-huh.
19	Q. Who is Kyle Nelson, if you know?
20	A. Kyle Nelson, I believe he was a
21	member when I was in College Republicans. When I was
22	president, he was a member. And then he took on a e-
23	board membership afterwards. I don't know the
24	specific membership he had.
25	Q. What's a e-board membership?

	Page 83
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. That's secretary, vice-president,
3	treasurer, one of the select titles.
4	Q. Okay. So after you left he was
5	an officer, but you don't know.
6	A. Yes, officer e-board, yes.
7	Q. Okay. Got you. Do you know what
8	information about the allegations in the complaint
9	Kyle has?
10	A. No.
11	Q. Was he at the tabling event?
12	A. I don't remember.
13	Q. Was he at the Laffer event?
14	A. Yes.
15	Q. Do you have any personal
16	knowledge whether Kyle has met with the attorneys
17	representing the plaintiffs in this matter?
18	A. I don't know. I can't speak for
19	Kyle.
20	Q. Are you cur and do you have
21	any current contact with Kyle?
22	A. I talked to Kyle four or five
23	months ago to check up how he was doing.
24	Q. Was that a personal conversation?
25	A. Personal conversation.

	Page 84
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Did you discuss the
3	lawsuit at all?
4	A. No.
5	Q. Did you discuss the facts of this
6	case at all?
7	A. Not that I can remember, no.
8	Q. Okay. Have you ever had a
9	conversation with him about this lawsuit or facts in
10	this case?
11	A. Not that I can remember.
12	Q. Okay. And do you have an
13	address, phone number, email address for Kyle?
14	A. I have a phone number.
15	Q. Okay.
16	MR. MOORE: I think you've already
17	given it to us, right?
18	MR. CRAIG: Yeah, I put it
19	MR. MOORE: Yeah
20	MR. CRAIG: to the extent these are
21	people we can find, we can and we haven't, we can
22	get that information for you.
23	MR. MOORE: All right.
24	BY MR. MOORE: (Cont'g.)
25.	Q. Another name I've seen here is

	Page 85
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Sebastian Roman. Do you know who is Sebastian Roman
3	is?
4	A. I have no idea.
5	Q. How about Thomas Gagliano?
6	A. Yes.
7	MR. MOORE: And Gagliano is G-A-G-L-I-
8	A-N-O for the stenographer.
9	BY MR. MOORE: (Cont'g.)
10	Q. Who is Thomas Gagliano?
11	A. He was the editor in chief of the
12	Binghamton Review.
13	Q. What is the Binghamton Review?
14	A. It is a paper on campus.
15	Q. And what information about the
16	allegations in the complaint does Thomas have, if you
17	know?
18	A. I don't know.
19	Q. Have you ever discussed the
20	claims in this case with Thomas?
21	A. Not that I'm aware of, no.
22	Q. Do you have any personal
23	knowledge whether Thomas has met with the attorneys
24	representing the plaintiffs in this case?
25	A. I don't know. I can't speak for

Page 86
B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
Tommy.
Q. Are you currently in contact with
Thomas?
A. No.
Q. And it's fair to say you don't
have current contact information for that individual?
A. I have his LinkedIn.
Q. Got you. Another witness is Dr.
Arthur Laffer, who
A. Uh-huh.
Q you're aware was a speaker
during November of 2019, I'm sure, correct?
A. Correct.
Q. Who is Dr. Laffer?
A. He's an economist.
Q. And he, of course, was present at
the speaking engagement, correct?
A. Correct.
Q. Do you have any personal
knowledge whether Dr. Laffer has ever met with the
attorneys representing plaintiffs in this case?
A. I don't.
Q. Are you you in currently in
any contact with Dr. Laffer at all?

	Page 87
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. No.
3	Q. Have you spoke with Dr. Laffer at
4	all since the events alleged in the complaint,
5	meaning the Laffer event?
6	A. Yes.
7	Q. Okay. When did you have contact
8	with Dr. Laffer after the Laffer event?
9	A. I helped to book him on Michael
10	Vasquez's show so he could give the speech he was
11	going to give on campus.
12	Q. So he went on the Vasquez podcast
13	or the YouTube
14	A. No Soundbites Allowed, yes.
15	Q. Okay. The YouTube channel.
16	A. Yep.
17	Q. Okay.
18	A. He called in.
19	Q. Okay. And do you have any
20	contact information for Dr. Laffer? You have no
21	current contact with him other than that?
22	A. No, I think we're LinkedIn
23	friends, but.
24	Q. Got you. All right. You know
25	who Jill Riccardi is?

	Page 88
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. No, name doesn't ring a bell.
3	Q. Are you aware of any other
4	witnesses other than the people we've named here
5	today to the tabling event of November 14, 2019?
6	A. Campus police probably, because
7	they were the ones at the scene.
8	Q. Okay. So and we'll get into
9	the the details of who was present. But as you
10	sit here today, do you know who was present at the
11	tabling event from the College Republicans?
12	A. The ones that I can remember are
13	me, Jon Lizak, Lacey Kestager, I know Turning Point
14	U.S.A. had a table set up.
15	Q. Okay. And we'll get into that.
16	A. Okay.
17	Q. Any other College Republican
18	members there?
19	A. Not that I can remember.
20	Q. Okay. Just the three?
21	A. Just as far as I remember, those
22	were the major there. There could have been more,
23	but those are the three that I specifically remember.
24	Q. Okay.
25	MR. CRAIG: So John, I assume you'll

	Page 89
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	get into this, but
3	MR. MOORE: I'm going to get into it.
4	MR. CRAIG: Yeah.
5	MR. MOORE: I'm just sort of setting
6	the base coat here.
7	MR. CRAIG: Yeah.
8	BY MR. MOORE: (Cont'g.)
9	Q. How about the Dr. Laffer event of
10	November 18, 2019. Are you aware of any other
11	witnesses who were present at that? And I'm not
12	asking you about campus police. But I'm asking you
13	about the names of individuals you know who were
14	there either as attendees, protesters, College
15	Republican
16	A. Bobby
17	Q members, anybody like that?
18	A. Bobby Walker was.
19	Q. Who was Bobby Walker?
20	A. At the time he was the head of
21	the New York State College Federation of College
22	Republicans.
23	Q. Okay. Do you have Bobby's
24	current contact information?
25	A. I'm Facebook friends with him.

	Page 90
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. When was Bobby there? Was
3	he there as an attendee or was he there as an
4	organizer or something else?
5	A. He was an attendee at the Laffer
6	event.
7	Q. Okay. Any other individuals you
8	know who were present in any context?
9	A. At the tabling or the Laffer
10	event?
11	Q. We're talking about the Laffer
12	event now.
13	A. Okay. Raj Kannappan from Young
14	Americans for Liberty.
15	Q. Okay.
16	A. For Young Americans Foundation.
17	Q. Yeah.
18	A. Sorry, I got my acronyms
19	confused.
20	Q. Okay. Anybody else?
21	A. Not that I can remember.
22	Q. Okay. Were there any College
23	Republican members there?
24	A. Yes.
25	Q. Who were those people?

	Page 91
1 .	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Preston Scagnelli, Jon Lizak,
3	Kyle Nelson, Bryn Lauer, Lacey Kestager, me, and
4	that's who I remember being there.
5	Q. Okay. Are you aware of the
6	identity of anybody else who was there?
7	A. Not that I can think of, no.
8	Q. Okay.
9	A. Actually, Joe Silverman, I
10	believe was.
11	Q. Who is Joe Silverman?
12	A. He was just a late member who
13	showed up to the club and wanted to get involved.
14	And then he transferred out to Cornell, I believe.
15	Q. When did he transfer to Cornell?
16	A. I don't know.
17	Q. Are you still in contact with
18	Joe?
19	A. No. I have his Facebook.
20	Q. Okay. I'm going back to the
21	caption, which is right in front of you there.
22	A. Okay.
23	Q. Do you have any understanding of
24	what plaintiff Young America's Foundation is?
25	A. What Young America's Foundation

	Page 92
1 -	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	is?
3	Q. Yeah.
4	A. Yes.
5	Q. What is it?
6	A. It's a I believe it's a
7	501(c)(3) nonprofit. And they're most known for
8	helping to maintain the Ronald Reagan Ranch in
9	California. I believe it's in California.
10	Q. Do they do anything other than
11	President Reagan's Ranch?
12	A. Yes, they help to match up
13	students with speakers and help to organize speaking
14	events in campus, campuses across the country. And
15	they put on a yearly retreat as well for some of
16	their students who participate with them.
17	Q. What do you mean by participate
18	with them?
19	A. If I remember how they work
20	correctly, you can start up your own little YAF Club
21	on your campus similar to the business model Turning
22	Point U.S.A. So anyone who's maybe a club member in
23	YAF or anything like that can attend their
24	conference.
25	Q. Okay. Did you do that?

	Page 93
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. No.
3	Q. All right. Have you ever hold
4	held any kind of role, position or membership in YAF?
5	A. No.
6	Q. Okay. And YAF is Young
7	American's Foundation, I'm just going to shorthand,
8	we'll refer to it as YAF, okay?
9	A. Okay.
10	Q. Okay. Did you have any contact
11	or communication with YAF before November 2019?
12	A. Before yes.
13	Q. Okay. And when was the first
14	time?
15	A. The first time was when I was in
16	College Libertarians and we were trying to get a big
17	speaker for the Liberty weekend event I was throwing.
18	Q. When was that?
19	A. I don't remember the exact days.
20	Q. Well, you were there for a
21	limited amount of time. This is when you were a
22	College Libertarians member at B.U., correct?
23	A. This was my freshman year at B.U.
24	Q. Okay. So this would have been
25	fall 2018 or spring 2019?

	Page 94
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Spring 2019.
3	Q. Okay. And you had contact with
4	YAF with respect to bringing a speaker to campus at
5	that point?
6	A. Yes.
7	Q. And did you succeed in bringing a
8	speaker to campus?
9	A. No.
10	Q. Okay. Why not?
11	A. Funding was an issue. We were
12	very underfunded, as well as just getting the
13	logistics down in such a short amount of time.
14	Q. Okay. Did you get so far as to
15	try to identify a possible speaker to bring to
16	campus?
17	A. Yes.
18	Q. And who who did you
19	contemplate brining to campus?
20	A. Barry Goldwater, Jr.
21	Q. Okay. And was it the case that a
22	fee was mentioned and you were not able to meet that
23	fee, is that a fair statement?
24	A. Correct.
25	Q. And that's the reason he didn't

	Page 95
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	come to campus?
3	A. That and the fact that it was a
4	little short notice for him to fly from Arizona, all
5	the way to New York.
6	Q. Got you. Okay. So did you ever
7	get so far as to reserve a room for that potential
8	A. Not we had already reserved a
9	room for the Liberty Weekend event, but not that I
10	know about the rest, no, not for him specifically.
11	Q. Does the Liberty Weekend event
12	have anything to do with the College Republicans?
13	A. No, it's College Libertarians.
14	Q. Okay. Different group, different
15	event.
16	A. Correct.
17	Q. Okay. When was the next time you
18	had contact with YAF?
19	A. The next time I was in contact
20	with YAF would have been the summer after my freshman
21	year at Binghamton University, which would have been
22	my sophomore year overall.
23	Q. Summer 2019, correct?
24	A. Correct.
25	Q. And how did you come to have

	Page 96
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	contact with YAF in the summer of 2019?
3	A. I was approached by George
4	Phillips about potentially getting a speaker to
5	campus.
6	Q. Remind me of who Phillips is
7	again?
8	A. Phillips is a man who's run for
9	Congress, congressional candidate locally here.
10	Q. And did he mention any potential
11	speaker he wanted to bring to campus?
12	A. He said to take a look at the YAF
13	website. And that he had some connections to a
14	couple of the speakers.
15	Q. So he never said to you, I want
16	you to bring this guy, I want you to bring this
17	woman, he just said
18	A. No, he he just named some
19	potential suggestions to us that he had some contacts
20	to that he could help use to bring them to said
21	campus.
22	Q. Did you reach out to Phillips
23	about that, or did Phillips reach out to you?
24	A. We had run into each other
25	somewhere out locally. And it just came about that I

	Page 97
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	was the head of the College Republicans, if I
3	remember correctly.
4	Q. Got you. And then who reached
5	out to you so was there an email contact or
6	something else?
7	A. I don't remember, probably phone
8	call if I had to I don't remember.
9	Q. So did Philips hook you up with
10	YAF, or did you suggest YAF, or how did that
11	A. He said to take a look, that he
12	had some friends in YAF as well as knew some of the
13	speakers and to take a look at their list.
14	Q. Okay. Did you take a look at
15	their list?
16	A. I did take a look at their list.
17	Q. And what happened when you took a
18	look at the list?
19	A. I went through some of the
20	potential speakers, their price ranges and who we
21	thought would be good to bring on campus.
22	Q. And did you come to any sort of
23	decision about who would be good to bring to campus?
24	A. Yes.
25	Q. And what did you decide?

	Page 98
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. We decided on Dr. Arthur Laffer.
3	Q. Did you consult with anybody
4	before you made the decision to bring Dr. Laffer to
5	campus?
6	A. I told Rein and Brian Murray, who
7	were the only two other club members at the time.
8	Q. Okay. This is all there in the
9	summer of '19?
10	A. Yes.
11	Q. Okay. And did you have further
12	contact with Phillips about this?
13	A. Yes.
14	Q. And what happened next?
15	A. We exchanged we we talked a
16	little bit, I don't remember how and just kind of
17	started to get down to him introducing me to some of
18	the YAF contacts and me talking to those YAF
19	contacts.
20	Q. And did he do make such an
21	introduction?
22	A. I don't remember.
23	Q. How did he make such an
24	introduction, if at all?
25	A. I don't remember.

	Page 99
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Do you come in contact with
3	anyone from YAF regarding bringing Dr. Laffer to
4	campus?
5	A. I believe at some point I was
6	reached out to because we put out that we wanted to
7	bring him to campus. Young America's Foundation
8	reached out after our inquiry about him.
9	Q. Okay. And at that time, what did
10	you know about YAF's contact with student groups on
11	other college campuses, if anything?
12	A. I didn't know, I've never worked
13	with them in the past. I went to I believe they
14	hosted Dick Cheney at Cornell the year before, and I
15	drove up to see Dick Cheney speak, and I believe that
16	was a YAF event. But that was the only other YAF
17	event I had been to.
18	Q. Okay.
19	A. At that point.
20	Q. See if we can refresh your
21	MR. CRAIG: John, at your convenience.
22	Just we've been going a little over an hour. I'd
23	appreciate a short break. But
24	MR. MOORE: Yeah, let's do it now.
25	MR. CRAIG: if this is a good time?

	Page 100
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	I don't want to
3	MR. MOORE: Yeah, it's great time.
4	MR. CRAIG: get in the way.
5	MR. MOORE: Any time is fine. Let's
6	take a break.
7	THE REPORTER: Off the record.
8	(Off the record, 10:17 a.m. to 10:17
9	a.m.)
10	BY MR. MOORE: (Cont'g.)
11	Q. You also have mentioned you're a
12	member of the College Libertarians?
13	A. Yes.
14	Q. What was the purpose of the
15	College Libertarians?
16	A. Very similarly to the College
17	Republicans, but with Libertarian principles.
18	Q. Okay. Were were the members
19	of the College Libertarians in fall of 2018 all
20	College Republicans, or they're different membership
21	to the students?
22	A. If I remember correctly, there
23	was mostly crossover between the two, maybe one or
24	two members who didn't go to College Republicans.
25	Q. Okay. So there were some

	Page 101
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Libertarians who were not College Republicans. Is
3	that fair to say?
4	A. Yes.
5	Q. Okay. And did Libertarians co-
6	host Laffer?
7	A. No.
8	Q. Did Libertarians have any
9	involvement in the tabling event?
10	A. Which tabling event? Do you mean
11	the tabling incident or the
12	Q. The the November 2000 when
13	I say the tabling the tabling event, I mean the
14	November 2014
15	A. Okay.
16	Q and '19 tabling.
17	A. Okay. Yeah, no, they were not
18	involved.
19	Q. Okay. Did the College
20	Libertarians hold any tabling events of their own
21	during your time with that group?
22	A. Yes, the University Club fair.
23	Q. The one you already told me
24	about?
25	A. Yes.

	Page 102
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. No others?
3	A. Not that I can remember.
4	Q. Okay. Got you. Okay. I am
5	going to show you an exhibit.
6	A. Okay.
7	MR. MOORE: And this is Defendants'
8	Exhibit Two marked with today's actually not
9	marked for the day. And I'll state for the record
10	that this is from the plaintiffs' disclosure in this
11	case and it is Bate stamped pages two forty-seven and
12	two forty-eight. Is that Counsel agree with that?
13	MR. CRAIG: Yeah, two forty-seven, two
14	forty-eight.
15	MR. MOORE: Yeah.
16	BY MR. MOORE: (Cont'g.)
17	Q. Do you this is a July 26
18	through 29th, 2019 email chain.
19	A. Uh-huh.
20	Q. Do you recognize these pages?
21	A. I have been C.C.'ed on the
22	emails, I don't specifically recom recognize these
23	emails.
24	Q. You're a party to the emails in
25	this chain?

	Page 103
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes.
3	Q. Did you receive Raj Kannappan and
4	by Raj is R-A-J, Kannappan is K-A-N-N-A-P-P-A-N. Did
5	you receive his email dated July 29, 2019 at nine
6	twenty-two a.m., which is on the first page of
7	Exhibit Two?
8	A. It appears I was C.C.'ed it on
9	the email, yes.
10	Q. Okay. Well, it says, "Thanks for
11	the introduction, George. John, let me know if you
12	are interested in a brief phone call next week. I'd
13	be happy to learn more about what you are doing at
14	Binghamton and how YAF might be able to assist you."
15	Did you receive that email?
16	A. I believe I did.
17	Q. Did you have a brief phone call
18	with Raj following that?
19	A. I don't remember if I did.
20	Q. Okay. Who is Raj Kannappan?
21	A. Raj Kannappan, I believe, works
22	for Young America's Foundation and is in charge of
23	their economic department.
24	Q. What is their economic
25	department?

	Page 104
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Essentially the economic side of
3	the Young American's Foundation.
4	Q. Okay. Have you ever discussed
5	the claims in this case with Raj after November of
6	2019?
7	A. I don't remember.
8	Q. Are you currently in any contact
9	with Raj Kannappan?
10	A. No.
11	Q. What contact, if any, occurred
12	after Monday, July 29 at nine twenty-two a.m. between
13	you and Mr. Kannappan?
14	A. We started working on some of the
15	logistics for getting Dr. Laffer on the campus.
16	Q. So at some point you discussed
17	with Mr. Kannappan co-sponsoring a speaker at B.U.?
18	A. Yes.
19	Q. And how many contacts did you
20	have with him?
21	A. I don't know. I don't remember.
22	Q. Do you personally have records or
23	emails which memorialize those contacts?
24	A. Not that I can think of, no.
25	Q. Okay. How were the contacts

	Page 105
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	how did the contacts take place?
3	A. Over if I remember correctly,
4	it was phone calls, and the Binghamton College
5	Republicans email.
6	Q. Okay. But if you look at this
7	A. Uh-huh.
8	Q there is restuccial@gmail.com.
9	That's not a College Republicans email, is it?
10	A. No.
11	Q. What is that?
12	A. That's my personal email.
13	Q. Okay. How many contacts did you
14	have with Raj over your personal email?
15	A. I don't know.
16	Q. Have you ever done a search for
17	emails with Raj on your personal email account
18	restuccial@gmail.com?
19	A. I have not, no.
20	Q. Okay. Do you still maintain that
21	email address?
22	A. Yes.
23	Q. Do you still utilize that email
24	address?
25	A. Yes.

	Page 106
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. I'm going to make a request on
3	the record that you search for any contacts with Raj
4	Kannappan.
5	A. Okay.
6	Q. I'm going to ask the same
7	question regarding planning for the Laffer event.
8	Did you use that email address to plan anything for
9	the Laffer event, whether contacts with Raj or
10	anybody else?
11	A. I don't remember.
12	Q. Okay. I'm going to ask that you
13	do a search of restuccia
14	A. Restuccial.
15	Q restuccial@gmail.com for any
16	planning or other contacts which deal in any way with
17	planning for the Laffer event. And since you don't
18	seem to remember a lot of things, I'm going to
19	reserve my right to ask further questions if those
20	emails reveal anything else.
21	A. Okay.
22	Q. The did you have any contacts
23	with other College Republicans or outsiders, and by
24	that I mean, other individuals regarding attending
25	the Laffer event with the Restuccial email address.

	Page 107
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Not that I'm aware of, no.
3	Q. But you can search for those?
4	A. I can search for those, yes.
5	Q. Okay. Got you. And were there
6	any emails using that email address
7	restuccial@gmail.com regarding planning for what
8	we've referred to as the November 2014 tabling event?
9	A. Not that I'm aware of, no.
10	Q. Okay. How was the tabling event
11	planned?
12	A. I don't remember.
13	Q. Okay. Well, we'll get into a
14	little
15	A. Okay.
16	Q more detail about that. Other
17	than restuccial@gmail.com, did you have any other
18	email addresses you utilized for contact with Young
19	America's Foundation and/or Raj Kannappan?
20	A. The College Republicans email for
21	the university.
22	Q. Okay. We've already discussed
23	getting an authorization for that email address. Any
24	other email addresses?
25	A. No, not that

	Page 108
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Did you text anybody from YAF?
3	A. Not that I can think of no.
4	Q. Did you use any other messaging
5	platforms to have contact with anyone from YAF
6	including but not limited to Raj Kannappan?
7	A. No.
8	Q. Okay. Did you settle on any date
9	to host the speaker?
10	A. Yes.
11	Q. Was Dr. Laffer the only speaker
12	considered?
13	A. Yes.
14	Q. Okay. And were there when
15	after you settled on a date, did date or dates change
16	at any point?
17	A. Yes.
18	Q. Okay. Why?
19	A. Rooms got switched around the
20	univer we had to work trying to make sure that
21	room was big enough with the right technology and
22	finding a room space that would work for what we
23	wanted to do of an event that size.
24	Q. Okay. So you wanted a certain
25	kind of room space? What room space were you looking

	Page 109
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	for?
3	A. I don't remember the specifics,
4	but we wanted a certain number of people to be able
5	to attend. And we also wanted it to have adequate
6	technology in case Dr. Laffer had a PowerPoint. And
7	we wanted also a podium so you can have a megaphone,
8	and he could stand comfortably.
9	Q. Okay. A megaphone or microphone?
10	A. Microphone.
11	Q. Got you. Once you had picked the
12	date, what steps, if any, did you personally take to
13	facilitate the speaker's appearance?
14	A. We had to secure funding in order
15	to get the speaker onto campus.
16	Q. Okay. Well, how much was his
17	fee?
18	A. We raised, if I remember
19	correctly, fifteen thousand dollars.
20	Q. Okay. And was that his fee, or
21	was there a set fee? I mean, did he say twenty grand
22	to appear on campus, was given a fee?
23	A. I I don't know. YAF handled
24	the more logistics of getting him here to Binghamton,
25	as well as help as covering the rest of the fee.

	Page 110
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. When you say you raised
3	fifteen thousand dollars, how did you do so?
4	A. I was put in contact with some
5	people who wanted to donate to the College
6	Republicans who would put up a thousand dollars each
7	in order to get that money because our budget was
8	five hundred dollars
9	Q. Got you.
10	A from the club.
11	Q. Okay. So you had five hundred
12	dollars from
13	A. The university.
14	Q the the club was given
15	the university gave five hundred dollars towards
16	whatever event you wanted to host, correct?
17	A. If I remember correctly, the
18	university had to approve of what that money was
19	spent on.
20	Q. Okay. Got you. And did they
21	approve that the five hundred dollars would be spent
22	on Dr. Laffer?
23	A. I don't remember if we used the
24	five hundred dollars for Dr. Laffer.
25	Q. Okay. How would we how would

	Page 111
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	we come to determine whether you used the five
3	hundred dollars for Dr. Laffer?
4	A. I don't know.
5	Q. Okay.
6	A. Potentially, the university would
7	have records, but I'm unsure. I'm not the
8	university.
9	Q. Okay. But you were the president
10	at the time?
11	A. Yes.
12	Q. Okay. And how did you know you
13	had five hundred you're telling me now that you
14	had five hundred dollars, so what's your source of
15	valid for that fact?
16	A. The if I remember correctly,
17	the previous president said that was our budget.
18	Q. Okay. And did you do anything in
19	terms of contact with the university to make sure you
20	had that five hundred dollars available for the
21	Laffer event?
22	A. I don't remember.
23	Q. Okay. Who would you have
24	contacted to determine whether you had funding for
25	the Laffer event, or access to that five hundred

	Page 112
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	dollars?
3	A. If I remember correctly, S.A.
4	Q. Okay.
5	A. The Student Association.
6	Q. Okay. Okay. So there may have
7	been five hundred dollars from the University or from
8	S.A.
9	A. Uh-huh.
10	Q. Okay. And those aren't the sa
11	so you're not sure whether it was from the university
12	or from the Student Association. Is that correct?
13	A. Correct.
14	Q. Okay. And then you raised a
15	thousand dollars from
16	A. Fifteen.
17	Q fifteen different people?
18	A. Fifteen individuals.
19	Q. And did you keep records on who
20	those people were?
21	A. At the time, yes.
22	Q. Okay. Where are those records
23	now?
24	A. I don't remember. I remember a
25	couple of the specific donors, but I don't know

	Page 113
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	remembers (sic) what the record was keeping that.
3	Q. Okay. Well, I'm going to request
4	those records and the identity of donors. And that's
5	a lot of money, correct, fifteen thousand dollars?
6	A. It is a lot of money, yes.
7	Q. Okay. And a thousand dollars is
8	a lot of money. So did you does does the group
9	maintain records as to where that money did you
10	have a bank account for the group?
11	A. Not that I can remember, no.
12	Q. How did you get the fifteen
13	thousand dollars? Was it given to you in cash, or
14	was it given to you in checks or somewhere
15	A. I believe that one of our donors
16	helped to get all the funds together to give to YAF.
17	Q. And who is that person?
18	A. I don't remember specifically.
19	If I had to guess it was Jeff Coghlen or George
20	Phillips.
21	Q. Okay. So either Jeff or George -
22	-
23	A. Uh-huh.
24	Q organized the money and then
25	they gave it directly to YAF?

	Page 114
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Uh-huh.
3	Q. And YAF paid Laffer?
4	A. As far as I'm aware. Again, I'm
5	not YAF. I don't know how that money was sent or
6	spent.
7	Q. Okay. And did YAF ever or did
8	Dr. Laffer's people ever tell you what Laffer's fee
9	was for the event?
10	A. Not that I'm aware of, no.
11	Q. Okay. It's just somehow money
12	changed hands, and did did it ever come through
13	the College Republicans?
14	A. We never know no, not that I'm
15	aware of.
16	Q. Okay. So someone just donated
17	money and that went straight to either YAF or Laffer?
18	A. Uh-huh.
19	Q. Okay.
20	A. As far as I'm aware.
21	Q. Okay. So ultimately, a room was
22	selected for the speaker, or rooms?
23	A. Yes.
24	Q. And how did you what was the
25	process for selecting the room?

	Page 115
1 .	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't remember how we selected
3	the room. I don't remember what service or how we
4	came about looking at available rooms.
5	Q. Well, was approval from anybody
6	required to secure the room?
7	A. Yes, I believe so.
8	Q. Okay. And what is your
9	understanding of the procedures required to secure a
10	room for a speaker or other event?
11	A. I don't remember.
12	Q. Okay. But you did ultimately
13	secure a room or rooms for the Laffer event?
14	A. Yes. Eventually, we worked it
15	out with one of the Student Honor Societies to use
16	the space they had gotten and trade spaces.
17	Q. Okay. Was that Student Finance
18	Society?
19	A. Potentially. I don't remember
20	what specific society.
21	Q. So at some point somebody had a
22	room and you switched times with them so you could
23	use the room?
24	A. Yes.
25	O Okay I'm going to show you

	Page 116
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	see if this refreshes your recollection, what has
3	been marked as Defendants' Exhibit Three.
4	MR. CRAIG: Thank you.
5	THE WITNESS: Question. Is this all
6	in email chain, or is this all the same email?
7	MR. MOORE: I am going to ask the
8	question, because I don't know. I will identify what
9	it is for the record.
10	MR. CRAIG: He'll tell you.
11	BY MR. MOORE: (Cont'g.)
12	Q. These are records that appear to
13	be a number of different emails, but they are Bate
14	stamped from the plaintiffs' disclosures in this
15	case, Bate stamped pages one fourteen through one
16	eighteen. And so in that context, it appears to be
17	five different events. Do you recognize these pages?
18	A. I do not, no.
19	Q. Okay.
20	A. But my email my student
21	email's associated with them.
22	Q. Okay. So we see at the top,
23	jrestuc1@binghamton.edu. Is that your student email
24	address?
25	A. That was my student email.

	Page 117
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. And it looks like at the top of
3.	each of these pages on Thursday, November 21st, 2019,
4	you sent this to someone named pcscagnelli@gmail.com.
5	A. Yes, that's Preston Scagnelli's
6	personal email.
7	Q. Why did you send these to Preston
8	in November of 2019 November 21 of 2019?
9	A. I don't remember.
10	Q. Okay. You don't remember why you
11	sent them to Preston?
12	A. I don't remember, no.
13	Q. Okay. And by reviewing these,
14	let's look at the the do you know in general
15	what these documents are other than the forwarding
16	email to Preston?
17	A. It looks as if it's almost a
18	digital receipt for rooms
19	Q. Okay.
20	A just by looking at it.
21	Q. We'll look at the first page,
22	which is Bate stamped page one fourteen. Do you
23	recognize this page?
24	A. One fourteen?
25	Q. Yeah, first page.

	Page 118
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Not particularly, no, it looks
3	like I say, it looks like a receipt.
4	Q. Okay. It says, "The following
5	room request has been approved." Do you see that?
6	A. Yes.
7	Q. At the middle of the page there?
8	Who would have approved that room request?
9	A. It would have been whoever was in
10	charge of room requests at the university.
11	Q. Okay. So university approving
12	the room requests. Is that correct?
13	A. As far as I'm aware.
14	Q. Okay. Do you know why you chose
15	that room? This is dated August 28, 2019, correct?
16	A. Correct.
17	Q. And it looks like the meeting
18	date was for October 7, 2019. Is that correct?
19	A. Correct.
20	Q. And the room information is zero
21	fourteen dash L.H. dash N. Do you know what room
22	that is?
23	A. It sounds like it's the lecture
24	hall, room fourteen, but I'm not completely sure.
25	Q. Okay. And was this for the it

	Page 119
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	says an event information for Arthur Laffer event,
3	correct?
4	A. Correct.
5	Q. Why was October 7 chosen?
6	A. I don't remember.
7	Q. And was the room and/or date for
8	Laffer event changed?
9	A. I believe so.
10	Q. Did Laffer speak on October 7?
11	A. I don't remember specifically
12	what day Arthur Laffer spoke.
13	Q. Okay. All right. If I told you
14	that the complaint alleges that he spoke on November
15	18 of 2019, would you agree with me?
16	A. Yes.
17	Q. Okay.
18	A. Yes.
19	Q. So I'll go back to my other
20	question.
21	A. Uh-huh.
22	Q. Did Arthur Laffer speak on campus
23	on October 7, 2019?
24	A. No.
25	Q. Okay. Do you know why that date

	Page 120
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	was changed?
3	A. I do not remember, no.
4	Q. Let's go to the second page.
5	This appears to be a reservation for the same that
6	was made on the same date, August 28, 2019. This is
7	Bates stamp page one fifteen of Exhibit Three,
8	correct?
9	A. Correct.
10	Q. And there's a different room
11	reserved here, one ten dash E.B. dash N. Do you see
12	that?
13	A. I do.
14	Q. Okay. And was this room request
15	approved by the university?
16	A. Yes, according to the the
17	following room has been requested, it says.
18	Q. And was this again for the Laffer
19	event?
20	A. Yes.
21	Q. And it looks like the date for
22	this is the the room was reserved for October
23	14, 2019. Do you see that?
24	A. Yes.
25	Q. Did Arthur Laffer speak on campus

	Page 121
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	on October 14, 2019?
3	A. No.
4	Q. Why did you choose that room, one
5	ten dash E.B. dash N?
6	A. I don't remember.
7	Q. Do you know where that's located?
8	A. No.
9	Q. Do you know why that date was
10	chosen?
11	A. I don't remember.
12	Q. Was the room and/or date changed?
13	A. Yes.
14	Q. Why was the room and/or date
15	changed?
16	A. I don't remember specifically why
17	the room was changed or the date was changed.
18	Q. Okay. Let's go to the next page,
19	which is Bates stamp page one sixteen. This appears
20	to be would you agree with me that this is a
21	reservation that was made on Tuesday, September 24,
22	2019?
23	A. Yes.
24	Q. And was this a room request for
25	one ten dash E.B. dash N?

	Page 122
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. It appears to be.
3	Q. And was this room request
4	approved by the university?
5	A. Correct.
6	Q. And was this room request for
7	Arthur Laffer to speak?
8	A. As far as I'm reading, yes.
9	Q. Okay. And was it looks like
10	the date here you're the one who made this
11	request, right?
12	A. I believe I did, yes, requester's
13	name.
14	Q. John P. Restuccia at
15	A. Uh-huh.
16	Q jrestuc1@binghamton.edu,
17	correct?
18	A. Correct.
19	Q. So you made it, right?
20	A. Yes.
21	Q. Okay. Would anyone else have
22	used your email address to make room requests?
23	A. Not that I'm aware of, no.
24	Q. Okay. So it was you, right?
25	A. Correct.

	Page 123
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. This was for November 8,
3	2019, correct?
4	A. Correct.
5	Q. Did Arthur Laffer speak on
6	November 8, 2019?
7	A. No.
8	Q. Why not?
9	A. I don't remember.
10	Q. Okay. Let's go to the next page.
11	Bates stamped page one seventeen.
12	A. Uh-huh.
13	Q. This is another room request,
14	correct?
15	A. Correct.
16	Q. And this was by you, correct?
17	You made this room request?
18	A. Correct, it appears.
19	Q. Okay. Would you have any reason
20	to doubt that you made this room request?
21	A. I don't have any reason to doubt,
22	I just don't remember specifically making it.
23	Q. Okay. Got you. And this is a
24	room request that was approved by the university. Is
25	that correct?

	Page 124
1.	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. It appears to be, yes.
3	Q. Okay. And this is for room one
4	thirteen dash P.B. dash H.S., correct?
5	A. Correct.
6	Q. Where what is that room?
7	A. I don't rem I don't know where
8	it is.
9	Q. You don't know where it is?
10	A. No.
11	Q. Do you know why you chose that
12	room?
13	A. I don't remember.
14	Q. Do you know what you chose that
15	room for?
16	A. It says it was a Arthur Laffer
17	speaking event, so I assume it's for the Dr. Laffer
18	event.
19	Q. Well, you would have made that
20	reservation, correct?
21	A. Correct.
22	Q. For the Laffer event. And you
23	picked a new date that was November 18, 2019?
24	A. Correct.
25	Q. Was that the ultimate date he

	Page 125
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	spoke?
3	A. Yes, I believe so.
4	Q. Was that the room he spoke in?
5	A. I don't know if that's the
6	lecture hall or not.
7	Q. Okay. And this is Bates stamp
8	page one eighteen. It is the final page of Exhibit
9	Three.
10	A. Uh-huh.
11	Q. Is this a different room request
12	for a diff made on a different date?
13	A. Yes.
14	Q. Okay. And the date of this
15	the date of the previous request Bates stamp one
16	seventeen was October 3rd, 2019, correct?
17	A. Correct.
18	Q. Now, this date is October 31,
19	2019, correct?
20	A. Correct.
21	Q. And the room requested was
22	approved, correct?
23	Yes, it appears to be.
24	Q. And this would've been room G
25	zero zero eight dash A.A. dash M.

	Page 126
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Uh-huh.
3	Q. Am I correct?
4	A. Correct.
5	Q. And what room is that? Do you
6	know where that's located?
7	A. I don't know where it's
8	specifically located.
9	Q. Okay. Do you know why you picked
10	that room?
11	A. I don't remember, no.
12	Q. Was this for Arthur Laffer?
13	A. Yes, it appears to be. It says
14	Arthur Laffer speaking on economics, yes.
15	Q. Okay. Okay. And the meeting
16	date was November 18, 2019?
17	A. Correct.
18	Q. And that was the date he
19	ultimately spoke, right?
20	A. Correct.
21	Q. Was this the room he spoke in?
22	A. I don't remember because I don't
23	know what room it specifically is.
24	Q. Okay. And you don't remember why
25	you forwarded all these emails to Peter Scaganelli

		Page 127
1	B.U. College, et al v Ro	ose, et al - 1/10/23 - J. Restuccia
2	(sic), correct?	
3	Α.	Correct, I don't remember.
4	Q.	Okay. I am going to show
5	Α.	Preston Scagnelli.
6	Q.	Preston Scagnelli, I'm sorry.
7	Α.	That's okay.
8	Q.	I'm going to show you what's been
9	marked as Defendant:	s' Exhibit Eleven. Give it to
10	your counsel. Pass	down the line. Do you recognize
11	this page?	
12	А.	I don't recognize it
13	specifically, no.	
14	Q.	Okay. Was this an email that was
15	forwarded to you on	Tuesday November 12th, 2019?
16	Α.	Yes.
17	Q.	Okay. And the title of the email
18	is "Event approved,	Dr. Arthur Arthur Laffer colon
19	Trumps comma Tariffs	s comma Trade Wars. Do you see
20	that?	
21	Α.	Yes.
22	Q.	And who was the recipient of this
23	email?	
24	Α.	It appears to be my student
25	email.	

	Page 128
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. So you received this
3	email, is that correct?
4	A. I don't remember, but I would
5	assume. I have no reason to doubt you, yeah.
6	Q. Well, it looks like you forwarded
7	this to P.C. Scaganelli (sic) on November 21, 2019,
8	correct?
9	A. Correct.
10	Q. Do you know why you forwarded
11	this to Mr. Scaganelli (sic) on November 21?
12	A. I don't remember.
13	Q. Okay. And what is this document,
14	it says, "Campus Group's Event"?
15	A. It appears to be an approval for
16	the Academic A Room G zero zero eight.
17	Q. Okay. And that was the final
18	room reservation we talked about from Exhibit Three,
19	correct?
20	A. It appears to be, yes.
21	Q. Okay. So is it fair to say that
22	the Dr. Laffer event for November 18th, 2019 was
23	approved by a school administrator as of November
24	12th, 2019?
25	A. It appears to be by this email

	Page 129
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	for yes, at this time.
3	Q. Do you know what school
4	administrator approved it?
5	A. I have no idea, no.
6	Q. Do you know what open for
7	registration means?
8	A. No.
9	Q. So I'll just say I'll just
10	read the first paragraph of the email to you. It
11	says, "Hi John, the event Dr. Arthur Laffer Trump,
12	Tariffs, Trade Wars, Monday, November 18, at seven
13	thirty p.m. was approved by a school administrator
14	and is now visible on the calendar and open for
15	registration if you allowed it in your event
16	settings." Did I read that correctly?
17	A. Yes.
18	Q. What does "open for registration"
19	mean in that context?
20	A. I do not know.
21	Q. Did you require reger
22	registration for this event?
23	A. I don't remember if we did or
24	not.
25	Q. Okay. What would it mean if you

	Page 130
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	had required registration?
3	A. I'm unsure what it would mean in
4	this context. I don't know.
5	Q. Would that mean that someone
6	would need to register to attend the event?
7	A. Again, I don't know what it would
8	specifically mean in this context.
9	Q. Did you require tickets for this
10	event?
11	A. No, we did not require tickets.
12	Q. And you don't know if you
13	required registration, correct?
14	A. Correct.
15	Q. And why did you not require
16	tickets?
17	A. We wanted it to be open to the
18	community, so people from the area could enjoy the
19	speaker.
20	Q. And did you have email contact
21	with anybody from YAF to prepare for this event prior
22	to November 18th, 2018?
23	A. Yes.
24	Q. And the email addresses you
25	utilized would've been the College Republicans email

	Page 131
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	address, correct?
3	A. Correct.
4	Q. And then your personal email
5	address @gmail.com, correct?
6	A. Correct.
7	Q. And would you have also used this
8	email address that we see in these last couple
9	emails, Exhibits Three and Eleven? Did you also use
10	jrestuccia1@binghamton.edu?
11	A. I don't remember if we used that
12	specifically, but potentially.
13	Q. Okay. And have you provided all
14	of those emails to the attorneys representing
15	plaintiffs in this case?
16	A. As far as I know, yes.
17	Q. Okay.
18	MR. MOORE: But we're also going to
19	make a request, I think we've already discussed
20	those.
21	MR. CRAIG: For the university?
22	MR. MOORE: For the his university
23	email address, College Republicans University email
24	address, and also his personal email address.
25	MR. CRAIG: Yep.

	Page 132
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. MOORE: And again, we can request
3	authorizations for the two university
4	MR. CRAIG: Yeah.
5	MR. MOORE: associated ones. The
6	other ones he'll have to do searches.
7	Okay. Let's move on to Exhibit Four.
8	MR. CRAIG: Put those aside.
9	THE WITNESS: Oh, I can put them
10	aside.
11	BY MR. MOORE: (Cont'g.)
12	Q. Yeah, I I'm definitely going
13	to be referring back to Exhibit One, so keep that one
14	handy.
15	A. Okay.
16	Q. The big one.
17	A. Okay.
18	Q. But the others I may go back to
19	or may not. I'm going to show you what's been marked
20	as Defendants' Exhibit Four.
21.	MR. CRAIG: Do you care if I hold on
22	to these?
23	MR. MOORE: You can hold on to the
24	exhibits, yeah.
25	And here's your copy of four.

	Page 133
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	I'll state for the record that this is
3	Bates stamped pages two thirty-seven through two
4	forty-one from plaintiffs' disclosures in this case.
5	It is marked as Defendants' Exhibit Four. And it
6	appears from my review of it to be a series of emails
7	dated September 26th, 2019 through October 18th,
8	2019.
9	BY MR. MOORE: (Cont'g.)
10	Q. Does that appear correct to you,
11	sir? Take your time and look at it if you'd like.
12	A. It appears to be correct.
13	Q. Okay. Do you recognize these
14	emails?
15	A. Not specifically, but they were
16	sent to my email and they say from John Restuccia.
17	So I assume I sent them.
18	Q. Are these emails between you and
19	Raj Kannappan?
20	A. Yes, it appears to be.
21	Q. And did Mr. Kannappan use your
22	and did you use your restuccial@gmail.com account for
23	this?
24	A. Yes, it appears to be.
25	Q. Okay. Let's go to page two

	Page 134
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	thirty-nine, sort of the beginning of the chain.
3	A. Okay.
4	Q. And at the bottom there you see a
5	September 27th, 2019 email. It's nine fifty a.m.
6	from Raj to you, correct? And it says, I'll read it.
7	"John comma please send me the questionnaire in word
8	of P.D.F. format. Thanks, Raj."
9	A. Uh-huh.
10	Q. Do you did I read that
11	correctly?
12	A. Correct.
13	Q. And what is the general
14	questionnaire what is the questionnaire? And at
15	the bottom you'll actually see that he attached
16	something called general questionnaire.
17	A. Uh-huh.
18	Q. You actually sent to him general
19	questionnaire, correct?
20	A. Correct.
21	Q. What is that general
22	questionnaire?
23	A. I don't remember what the general
2.4	questionnaire is, but I remember me having to send it
25	again because I accidentally sent it in pages and not

Associated Reporters Int'l., Inc.

Page 135 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 a P.D.F. or Word format. 3 Q. Pages is a different format. So 4 your -- your email chain, should you still have it, 5 it should have the documents you sent to Raj, correct? 6 7 Α. Correct. Okay. I'm going to make a 8 0. 9 request for those records from plaintiffs' attorney, and I will follow up. Then let's move up the chain a 10 11 bit. And I'm referring you to Bates stamp page two 12 thirty-eight. Are you there? Two thirty-eight? 13 Α. 14 Yeah. Q. 15 Α. Yes. 16 Q. And looks like Raj emailed you on 17 October 28th -- I'm sorry, October 8th, 2019. It 18 says, "Hi, John, please complete the two attached YAF 19 documents, contracted event questionnaire as soon as 20 you can and email them back to me. A contract is the 21 more time sensitive document. Will you need to work 22 with your advisor or other administrative folks on campus to get this completed? 23 24 "Also attached is a speaker packet 25 that provides general guidance on preparing for your

		Page 136
1	B.U. College, et al v Ros	se, et al - 1/10/23 - J. Restuccia
2	event. Feel free to	let me know what questions you
3	have. Thanks, Raj."	Did I read that correctly?
4	Α. (Correct.
5	Q. I	Did he send these documents to
6	you?	
7	Α	The documents being the contract
8	and questionnaire?	
9	Q	Yep. Excuse me.
10	A	Yes, it appears he attached the
11	general questionnaire	e.
12	Q. (Okay. Was the contract completed
13	and signed?	
14	A. A	As far as I'm aware, yes.
15	Q. A	And who completed and signed it?
16	Α.	I don't remember, but I don't
17	remember who filled	it out.
18	Q. V	Well, who was it intended for?
19	What is your memory o	of that?
20	A	I don't remember.
21	Q. V	Was it to the College Republicans
22	or somebody outside t	the College Republicans?
23	A	I believe it was to the College
24	Republicans.	
25	2 Q.	Or was it you personally who

Associated Reporters Int'l., Inc.

Page 137 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 1 2 entered into the contract? 3 I don't remember. Α. 4 0. Okay. Did you complete and sign 5 this contract? 6 I believe, because I said here's Α. 7 the speaker contract though. 8 Q. Yes, I was going to get there 9 next. So on October 10 of 2019, you write to Raj. 10 Hi Raj, I've already filled out the event 11 questionnaire in one of our previous emails, so I'm rather confused. Here's the speaker contract though 12 13 from John Restuccia. You sent that email, correct? 14 Α. Correct. 15 Q. And you included the completed 16 speaker -- or I'm sorry, the included completed 17 speaker contract, is that right? I'm not seeing an attachment for 18 19 it in the emails, so I'm unsure. 20 Q. Okay. But that -- you'll concede that that email says, "Here is the speaker contract"? 21 22 Α. Correct. 23 So is it fair to assume that if 24 we went back and found that original October 10 email, you would probably find the attached P.D.F. 25

	Page 138
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Is that fair assumption?
3	A. Probably, yes.
4	Q. Okay. I'm going to ask you to go
5	back and find that and provide me with that contract,
6	okay?
7	A. Uh-huh.
8	Q. All right. And not me, I mean,
9	provide your attorney with that and then he will
10	provide it to me, I'm sorry about that.
11	A. Okay.
12	Q. You don't need to provide it
13	directly to me.
14	And you have no memory of what the
15	contract was, huh?
16	A. No.
17	Q. What was the event questionnaire?
18	A. I don't remember.
19	Q. Do you know if it was completed?
20	A. Yes.
21	Q. Okay.
22	A. That I do remember, because I
23	remember having to change the format of it from pages
24	to Word of P.D.F.
25	Q. Is it fair to say you are the

	Page 139
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	person who would've completed it, or would've been
3	someone else in the College Republicans?
4	A. I don't know specifically.
5	Q. Okay.
6	A. I don't remember.
7	Q. All right. But you can hunt it
8	down and figure that out, correct?
9	A. Potentially, yes, if it's still
10	in my email.
11	Q. Okay.
12	MR. MOORE: I'm going to reserve my
13	right to ask questions about it should we locate and
14	receive this document.
15	BY MR. MOORE: (Cont'g.)
16	Q. What about the speaker packet
17	that was referred to in Roger's October 18th, 2019
18	email which is part of Exhibit Four? Do you know
19	what that was?
20	A. No.
21	Q. Okay. Do you still have a copy
22	of that speaker packet?
23	A. Potentially, in my email.
24	Q. Okay. I'm going to make a
25	request for that as well. All right. Then there's

	Page 140
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	an let's go to the first page. This is Bates
3	stamp page two thirty-seven of Exhibit Four, are you
4	there?
5	A. The first page two thirty?
6	Q. First page of Exhibit Four.
7	Right there, you got it open.
8	A. Correct, okay.
9	Q. Okay. There's an October 15
10	email on the bottom of that page.
11	A. Uh-huh.
12	Q. It's from Raj to you, correct?
13	A. Correct.
14	Q. It says, "Thanks John. Yes, you
15	did previously send me the event questionnaire, but
16	since we finalized the lunchtime of one p.m. and
17	lecture time is seven p.m., I don't know if the event
18	locations for both of these were different. Please
19	send me the location details for both of these when
20	you can. Thanks." Did I read that correctly?
21	A. Correct.
22	Q. Okay. What does the lunch time
23	of one p.m. refer to?
24	A. I believe it refers to the time
25	we had lunch a private lunch with Dr. Laffer.

	Page 141
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Who is we?
3	A. Some of the e-board members and
4	I.
5	Q. Okay. And who are those people
6	that lunched with Dr. Laffer?
7	A. Lacey Kestager, Jon Lizak,
8	Preston Scagnelli, potentially Spencer Hayes. We
. 9	invited the SUNY Broome College Republicans. So
10	Michael Woodward, who is the president of the SUNY
11	Broome College Republicans. Excuse me. And that is
12	who I remember. And
13	Q. What was Michael's name?
14	A. Michael Woodward.
15	Q. Okay. So you, Lizak, Kestager,
16	Scagnelli, perhaps someone from the Broome County
17	College Republicans. Was anyone else at that lunch?
18	A. The the Honor Society
19	President where we switched the rooms. I made a deal
20	with them to get them to attend the lunch if they
21	could switch rooms with us.
22	Q. Was that the finance society?
23	A. I don't remember the specific
24	society again.
25	Q. Okay. I may have that somewhere.

		Page 142
1	B.U. College, et al v R	ose, et al - 1/10/23 - J. Restuccia
2	Was anyone else at	the the Dr. Laffer was
3	there?	
4	Α.	Dr. Laffer was there, correct.
5	Q.	Did he have any people with him?
6	Α.	Not that I can remember.
7	Q.	Okay. Was there anyone from YAF
8	there?	
9	A.	Not that I can remember.
10	Q.	Okay. Where did the lunch
11	happen?	
12	Α.	I believe it was at a hotel in
13	Binghamton. I don'	t believe it was at Little Venice,
14	because I don't reme	ember eating pasta.
15	Q.	Is that a hotel in Binghamton?
16	Α.	Yes.
17	Q.	Do you know which hotel?
18	Α.	No, I don't remember
19	specifically, no.	
20	Q.	Do you remember where it was
21	located?	
22	Α.	No.
23	Q.	Okay. What occurred at the
24	lunch?	
25	Α.	We got to ask Dr. Laffer some

	Page 143
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	questions about his what he some of his
3	experiences, some of his experiences working with
4	previous presidents and some of his economic
5	policies.
6	Q. Okay. And who paid for the
7	lunch?
8	A. I don't know.
9	Q. Do you know if the lunch was
10	incorporated into the contract and part of Dr. Laffer
11	fees?
12	A. I don't remember, no. I don't
13	know.
14	Q. Was was the contract something
15	that talked about the fees that were to be paid to
16	Dr. Laffer?
17	A. I don't know.
18	Q. You don't know?
19	A. I don't remember, no.
20	Q. Okay. Well, we can get that
21	contract and bring you back here to talk about that
22	if you don't remember. You don't remember?
23	A. I don't remember.
24	Q. Okay. This also says let's go
25	to October 16th, 2019 email from you.

	Page 144
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Uh-huh.
3	Q. It says, "I can call tomorrow
4	definitely and the lunch will occur at a restaurant
5	called Little Venice at one p.m. in the afternoon
6	after his press conference with George."
7	A. Uh-huh.
8	Q. So but it didn't happen at
9	Little Venice, is that correct?
10	A. I don't believe it happened at
11	Little Venice, no.
12	Q. Okay. And what does after his
13	press conference with George refer to?
14	A. I believe George Phillips had a
15	press conference with him after the lunch.
16	Q. Okay. Were you there?
17	A. I was not there.
18	Q. Was the press conference in the
19	meeting with Phillips, did do you know if a press
20	conference occurred?
21	A. Yes, a press conference did
22	occur.
23	Q. Okay. Did you see anything on
24	the T.V. or anywhere else?
25	A. I read it on I believe

	Page 145
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
.2	Pressconnects is the only newspaper around here that
3	this had occurred.
4	Q. Okay. And do you know if his
5	appearance at that press conference was also
6	incorporated into whatever fee he was paid?
7	A. I don't know.
8	Q. Okay. Could have been, might not
9	have been, you just don't know
10	A. I just don't know. I don't know.
11	Q. Okay. Fair enough. And George
12	is George Phillips?
13	A. Uh-huh.
14	Q. And you do you know where the
15	press conference occurred?
16	A. No, I don't know where the press
17	conference occurred.
18	Q. Do you know anyone else who
19	attended other than your you didn't, correct?
20	A. No, I did not.
21	Q. Do you know anybody who didn't
22	show up?
23	A. George Phillips, Dr. Arthur
24	Laffer, and I believe some of the news media.
25	Q. Okay. All right. I am done with

	Page 146
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Exhibit Four.
3	A. Can I take a short restroom
4	break, please?
5	Q. Sure. We can go off the record
6	now.
7	THE REPORTER: Off the record.
8	(Off the record, 10:59 a.m. to 10:59
9	a.m.)
10	THE REPORTER: On the record.
11	BY MR. MOORE: (Cont'g.)
12	Q. Sir, I'm going to show you what's
13	been marked as Defendants' Exhibit Five.
14	A. Sure.
15	Q. Document titled "Reservation
16	Guidelines." This is from the Plaintiffs' Rule 20 or
17	rather Plaintiffs' disclosures. And somehow we
18	have cut off the Bates stamp numbers when it was
19	photocopied. So
20	MR. CRAIG: He's got the Bates.
21	THE WITNESS: No, I got the Bates.
22	MR. CRAIG: On that one.
23	MR. MOORE: Okay. The first page is -
24	- I think I have a copy that I so I do have a copy
25	

	Page 147
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. CRAIG: I can read the numbers
3	into the record if you want, John
4	MR. MOORE: Yeah.
5	MR. CRAIG: This is sorry. Bates
6	stamp two eight six through two nine two.
7	MR. MOORE: Okay. That's what I was
8	going to say because I have the original document I
9	used for copying here, so.
10	BY MR. MOORE: (Cont'g.)
11	Q. We have identified the Bates
12	stamp numbers. I'm handing one to your attorney.
13	And then I'm passing it down the line to the others
14	here. That's document titled, "The union and
15	reservation guidelines." Do you do you have any
16	idea what these this document is?
17	A. I don't know.
18	Q. Okay. Is this the process you
19	used for reserving space for rooms in the union?
20	A. Reading through it, it appears to
21	be.
22	Q. Is this the document that would
23	be at the guidelines for reserving tables?
24	A. I don't know.
25	Q. Okay. It might be, it might not

	Page 148
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	be, you just don't know as you sit here today?
3	A. I yeah.
4	Q. Okay. We'll move on. I'm going
5	to show you what has been marked with the designation
6	Defendants' Exhibit Six. I will state for the record
7	that these are Bates stamped pages one nineteen and
8	one twenty from plaintiffs' disclosures. Take your
9	time and have a look at it. But I will ask you if
10	you recognize these documents?
11	And I'll first state for the record
12	that it appears to be have sent from your Gmail
13	account to to an email account lizakjon@gmail.com.
14	A. Uh-huh.
15	Q. What is lizakjon@gmail.com?
16	A. I believe it's Jon Lizak's email.
17	Q. That would seem to be a logical
18	conclusion. At the top of the page, it says, "Jon
19	Lizak" and then "lizakjon@gmail.com."
20	A. Uh-huh.
21	Q. Okay. And you sent this to Mr.
22	Lizak, if it is indeed him, on Thursday May 26th,
23	2022?
24	A. Yes, it appears I did.
25	Q. Less than a year ago, correct?

	Page 149
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Correct.
3	Q. Why'd you send it to him?
4	A. I don't remember why I
5	specifically sent it to him.
6	Q. You don't remember why you sent
7	this to him some eight months ago? Did he ask you to
8	send you did he did he ask you to send him
9	documents related to this lawsuit?
10	A. Yes, I believe he did ask me to
11	send them.
12	Q. And how did he ask you to send
13	him documents related to this lawsuit?
14	A. I don't remember specifically how
15	he asked me, but I remember him asking if I had
16	anything in my email regarding the some of the
17	Laffer event information.
18	Q. Okay. And how many emails did
19	you send him?
20	A. I don't remember.
21	Q. Okay. Can you I'm going to
22	ask that you go back into your emails and find that
23.	I'm going to make a request for all of those emails.
24	MR. CRAIG: Yeah, I believe this was
25	part of our collection.

	Page 150
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. MOORE: I I figured that, yeah.
3	But I'm asking what the witness knows about it.
4	BY MR. MOORE: (Cont'g.)
5	Q. I mean, did how did you have
6	contact with Mr. Lizak regarding your search for
7	these documents? Did you talk to him on the phone?
8	Did you have an email conversation? Was it Facebook
9	messaging something
10	MR. CRAIG: I'm going to object if
11	it's part of our collection. As the former
12	president, it would be part of the response at the
13	direction of counsel to to the extent they
14	discussed our instructions for collecting
15	MR. MOORE: Well, I'm not asking you
16	to the extent that anything came from the attorneys.
17	I I wouldn't I I wouldn't want to ask you
18	about that.
19	MR. CRAIG: Do you do you remember
20	Jon discussing these requests with you at all?
21	THE WITNESS: I remember Jon
22	discussing, yes.
23	MR. CRAIG: Did he tell you why he was
24	requesting any of these documents?
25	THE WITNESS: Counsel wanted them.

	Page 151
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	BY MR. MOORE: (Cont'g.)
3	Q. Was that a phone call or was it
4	something else?
5	A. It was something else, I believe.
6	Q. And what was the something else?
7	A. I believe it was a text.
8	Q. It was a text. Okay. Do you
9	still have copies of that text?
10	A. I believe so.
11	Q. Okay. Is it on your phone right
12	now as you sit here today?
13	A. It could be, I can it's over
14	in my coat pocket, if I can go get it quick?
15	MR. CRAIG: Yep.
16	MR. MOORE: And I'll allow you to
17	review it, and if it does say anything ref
18	referencing counsel, then we'll ask your attorney to
19	advise us of that and we'll move on.
20	MR. CRAIG: Yes, I'll represent that
21	he has a text here from this is
22	THE WITNESS: This is Jon Lizak's
23	number.
24	MR. CRAIG: Okay. It it's a
25	screenshot and says from the lawyers and there's some

	Page 152
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	instruction
3	MR. MOORE: Okay.
4	MR. CRAIG: on that. Let me
5	quickly I'm actually I'm looking at that. The
6	date on that is after this request.
7	THE WITNESS: Okay. So do you want me
8	to go
9	MR. CRAIG: Go scroll up to
10	THE WITNESS: I'll scroll up
11	MR. CRAIG: May 20 May 2022 and
12	see if you have.
13	THE WITNESS: Right here, May 25th.
14	MR. CRAIG: Yeah, so. May 25th,
15	there's a request, the lawyers are requesting and it
16	has instructions for how to perform a search.
17	BY MR. MOORE: (Cont'g.)
18	Q. All right. So you sent this to
19	Lizak based on a request from the lawyers, is that
20	fair to say?
21	A. Correct.
22	Q. Okay. Let's go to the actual
23	email chain, which is October 21 to 22.
24	A. Uh-huh.
25	Q. And do you recognize this chain?

	Page 153
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	This appears to be two emails really.
3	A. Correct. I don't rec
4	recommend like remember the specifics of this
5	email, no. But it appears I was forwarded it.
6	Q. Okay. Well, you're on both
7	emails and the recipients aren't it says from Jeff
8	Colon
9	A. Coghlan.
10	Q. Coghlan. Okay. Doesn't and
11	it says, "To Jeff Coghlan."
12	A. Uh-huh.
13	Q. So who's Jeff Coghlan?
14	A. Jeff Coghlan was one of our
15	donors who helped to get the Laffer program off the
16	ground.
17	Q. Okay.
18	MR. MOORE: And I'll state for the
19	stenographer that first name is Jeff, the last name
20	is Coghlan which is C-O-G-H-L-A-N.
21	BY MR. MOORE: (Cont'g.)
22	Q. And you don't know who the
23	recipients of these emails were other than you?
24	A. No, I don't.
25	Q. So you were a recipient, but you

	Page 154
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	don't know who else?
3	A. No, correct.
4	Q. And is he involved with some
5	organization that the B.U. Republicans were involved
6	with?
7	A. I don't know. I can't speak for
8	Jeff Coghlan.
9	Q. Well, you said he helped
10	facilitate the money for Dr. Laffer, is that right,
11	is your earlier testimony?
12	A. Correct.
13	Q. Is he involved with any sort of
14	organization that the College Republicans were
15	involved?
16	A. I would assume the Young
17	America's Foundation
18	Q. Okay.
19	A who helped put on Dr. Laffer.
20	Q. But you don't know?
21	A. I don't know specifically, no.
22	Q. Okay. And you'll say you'll
23	see there's a an October 21, 2019 email there?
24	A. October 21, 2019, you said?
25	Q. Yep.

	Page 155
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. At
3	Q. It's the main email at the bottom
4	of this.
5	A. Okay. At three fifteen.
6	Q. Yeah. It says, "First, please
7	accept my most sincere thank you for agreeing to be
8	part of the effort to assist the Binghamton
9	University College Republicans. There will be twenty
10	of us. We will be doing three things to start with."
11	Do you see that? Did I read that correctly?
12	A. Correct.
13	Q. And who are the twenty of us
14	referred to?
15	A. I don't know specifically who the
16	twenty are. I would assume they were the donors.
17	But again
18	Q. Are these the people who donated
19	the fifteen thousand dollars that you referenced?
20	A. I believe it was fifteen.
21	Q. Okay. Well, that's what you
22	testified earlier, correct?
23	A. Correct.
24	Q. All right. Number one, beneath
25	that intro says, "Along with the Young America's

	Page 156
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Foundation, we will be underwriting a speaking
3	engagement with economist and Presidential Medal of
4	Freedom Winner or Laffer. Dr. Laffer will be
5	speaking to and dining with B.U. students on November
6	18th." Did I read that correctly?
7	A. Correct.
8	Q. Do you know the identity of any
9	other individuals who underwrote the speaking
10	engagement other than Mr. Coghlan?
11	A. No, I do not.
12	Q. And do you know how they
13	underwrote the speaking engagement?
14	A. I don't, no.
15	Q. And it says number two, "We will
16	all be a part of the B.U. Republicans Advisory Board.
17	Our challenge will be to assist them in growing their
18	membership and developing their leaders." And then
19	it goes into some other detail about what they're
20	going to do. Who was part of that B.U. Republicans
21	Advisory Board?
22	A. If I remember correctly, Jeff
23	Coghlan, George Phillips, Dan Reynolds, Fred Akshar,
24	and I don't remember the rest.
) E	O Ware all of the meanle you

Associated Reporters Int'l., Inc.

Page 157 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 mentioned part of the donors that gave money to Dr. 3 Laffer? 4 Α. Yes, I believe so. 5 Okay. And then number three it 0. says, "Lastly, each of us has made a financial 6 7 commitment. We will each send a check to the Young America's Foundation 501(c)(3) in the amount of seven 8 9 fifty in another check in the amount of two fifty in 10 support of the B.U. College Republicans. On the 11 advice of one of our members we have researched this 12 piece a little deeper. In an effort to avoid any entanglements with university rules, we have 13 14 concluded that the best recipient of the funds to be 15 the Broome County Republican Committee. They will 16 deal with ensuring that the funds move appropriately to the Binghamton University College Republicans." 17 18 And then it talks about who checks 19 should be made out to. Does it -- did I read that 20 correctly? 21 Α. Correct. Okay. So it looks like whoever 22 Q. 23 these donors were would send seven hundred and fifty 24 dollars to Young America's Foundation, correct? 25 Α. It appears to be, yes.

	Page 158
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. And then after that they
3	would also send two hundred and fifty dollars to the
4	Broome County Republican Committee, correct?
5	A. It appears to be, yes.
6	Q. So is it fair to say that the
7	B.U. Republicans never actually received any of this
8	money directly, correct?
9	A. I don't remember if we did or not
10	directly.
11	Q. Well, if the B.U. Republicans
12	had, did the B.U. Republicans have a bank account, as
13	you would know this as president, or would only the
14	treasurer know that?
15	A. I don't remember.
16	Q. Okay.
17	A. I genuinely don't remember I
18	don't remember it.
19	Q. Okay. Well, do you remember if
20	the College Republicans had a bank account?
21	A. I don't remember, no.
22	Q. Okay. Would the treasurer know
23	that?
24	A. I don't know
25	Q. Okay.

	Page 159
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A if the treasurer would know
3	that or not.
4	Q. What is the function of a
5	treasurer for the College Republicans?
6	A. Essentially, the function was to
7	if we were if I remember correctly, the
8	university required one, so we had one in place.
9	Q. All right. And who was that
10	person remind me of who that person was during
11	your presidency?
12	A. I believe it was Brian Murray.
13	Q. So would Brian know about where
14	this money went or how the B.U. Republican's money
15	was handled?
16	A. I can't speak for Brian Murray,
17	so I don't know.
18	MR. MOORE: And we're requesting
19	Brian's contact information.
20	MR. CRAIG: Yes.
21	MR. MOORE: So we'll dig into that a
22	little more with him.
23	BY MR. MOORE: (Cont'g.)
24	Q. Okay. And do you have any idea
25	of what this money was used for, the seven fifty to

	Page 160
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Young America's Foundation and the two fifty to
3	Broome County Republican Committee?
4	A. Judging by the email, I would
5	assume it was going to the funding for the Dr. Laffer
6	event.
7	Q. Okay. And do you know whether
8	there was a again, particular fee for Laffer set.
9	Was that involved in the contract that you signed?
10	A. I don't remember the contract,
11	so.
12	Q. Okay. We'll get a copy of that
13	and dig back in if we need to.
14	A. Okay.
15	Q. Other than reserving the room for
16	Dr. Laffer's speech which we already talked about,
17	did you have any contact before the tabling event or
18	before Dr. Laffer's speech with the university or the
19	University Police regarding the event?
20	A. Yes.
21	Q. Okay. Did you have any contact
22	with Defendant Brian Rose regarding that?
23	A. Not that I can remember.
24	Q. Did you have any contact with
25	President Harvey Stenger on that subject matter?

Associated Reporters Int'l., Inc.

Page 161 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 1 2 Α. No. 3 Did you have any contact with Q. 4 B.U. Police Chief John Pelletier regarding the run up 5 to either the tabling event or the Laffer event? 6 With regards to both events did I Α. 7 meet with him at any time before --8 Q. Did you ever have any contact, 9 not necessarily meeting, emails, phone calls, any sort of contact with Chief Pelletier? 10 11 Α. Yes. 12 Okay. When did you have contact Q. with Chief Pelletier? 13 14 Α. I believe it was after the 15 tabling event. 16 0. Okay. And what was -- can you 17 describe what that contact was? 18 The -- they had -- the University 19 Police Department wanted to have -- to talk to me. 20 And I believe Jon Lizak was in that meeting as well, if I remember correctly, about some of the security 21 22 concerns they had as well as what had happened with 23 the tabling event. They were a little concerned 24 about what was -- security was going to be like. 25 For the Laffer event? Q.

	Page 162
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Correct.
3	Q. Okay, got you. All right. And
4	we'll get into that a little deeper. Did you have
5	any contact with the police department or anybody in
6	the police department, the U.P.D.? Do you understand
7	what I mean when I say U.P.D?
8	A. Yes.
9	Q. Okay. U.P.D. was University
10	Police Department. Did you have any contact with
11	anybody from the U.P.D. before either the tabling or
12	Laffer event?
13	A. Yes.
14	Q. Who did you have contact with?
15	A. I believe it was Inspector
16	Gallagher Detective Gallagher.
17	Q. Okay.
18	A. I forget his title.
19	Q. Okay. All right. And who
20	reached out to who? Did Gallagher reach out to you
21	or did you
22	A. Gallagher reached out to me, yes.
23	Q. Okay. When did he reach out to
24	you and how?
25	A. He reached out a bit of time

	Page 163
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	before the case against socialism event, whether it
3	be a week or a couple days before the case against
4	socialism event, because he was a little concerned
5	about the security measures for that event.
6	Q. For the for the case versus
7	socialist?
8	A. Correct.
9	Q. So here and was that a phone
10	call, was that an email, was it something else?
11	A. I believe it was an email to get
12	in touch with me and then the rest of the contact, I
13	don't remember.
14	Q. Okay. Let us discuss that email.
15	Here is Defendants' Exhibit Seven.
16	A. I can't read some of those.
17	Q. Yeah, it's a bit difficult. I'll
18	see if I can find a better copy here.
19	A. Okay.
20	MR. MOORE: Because I just want to
21	confirm with your counsel that this is a better
22	copy, then I can re-mark this one if you want. Oh,
23	okay.
24	MR. CRAIG: You need me to
25	MR. MOORE: This look better to you?

	Page 164
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	I got I've got some right here. I'll use the same
3	ones.
4	BY MR. MOORE: (Cont'g.)
5	Q. Does that look better to you
6	guys?
7	A. Oh, yes.
8	Q. Okay.
9	A. That's much clearer.
10	Q. And give me that one back.
11	A. Okay.
12	Q. And I'm going to mark that one a
13	second. You can hand it back to me for one second.
14	MR. CRAIG: Here you go.
15	MR. MOORE: I should have one out
16	anyway.
17	BY MR. MOORE: (Cont'g.)
18	Q. Okay. Sir, I am providing to you
19	what has been re-marked as Defendants' Exhibit Seven
20	with today's date.
21	A. Uh-huh.
22	Q. Whether, on today's date. This
23	is a email chain with Joe Gallagher investigator
24	N.Y.S. University Police. It is Bates stamped page
25	twelve ninety-one from Defendants' Rule 26

	Page 165
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	disclosures. And it appears to be an at least in
3	part an email with you at your
4	jrestuccia1@Binghamtonedu email
5	MR. CRAIG: John, sorry to interrupt.
6	Is this from our production or from
7	MR. MOORE: It's from defendants'
8	production.
9	MR. CRAIG: Okay.
10	MR. MOORE: Yeah. I think I said
11	that, but if I did not make it clear, it is from our
12	Rule 26 disclosures.
13	BY MR. MOORE: (Cont'g.)
14	Q. Do you recognize these this
15	exchange, sir?
16	A. Yes.
17	Q. Okay. Who is Joe Gallagher? Is
18	he the investigator you're referring to?
19	A. Yes.
20	Q. Okay. And was Officer
21	Gallagher's email to you the first interaction you
22	had with him?
23	A. As far as I remember, yes.
24	Q. And what does his October 15th,
25	2019 email at five sixteen p.m. return refer to?

	Page 166
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. You said October 25th, correct?
3	Q. October 15th, 2019 email at five
4	sixteen. What what is what is he referring to,
5	the round table event?
6	MR. CRAIG: I I think it's an
7	October 25th
8	THE WITNESS: 25th.
9	MR. CRAIG: Not 15th at the bottom.
10	MR. MOORE: Oh, you're right. Okay.
11	THE WITNESS: That's
12	MR. MOORE: That was a typo.
13	THE WITNESS: Sorry, I was looking for
14	
15	MR. MOORE: I'm sorry. Yeah, it is
16	confusing. October 25th. Okay.
17	BY MR. MOORE: (Cont'g.)
18	Q. So do you see that there is an
19	October 25th, 2019 email for the time is five
20	sixteen p.m., at the bottom of this email chain?
21	A. Correct.
22	Q. And that reads, "John, I
23	understand that the Binghamton University College
24	Republicans will be holding a round table event in
25	L.H. nine on October 28. Are you anticipating any

	Page 167
1 .	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	issues or attendance from the members of PLOT or the
3	Associated Student Groups? Let me know when you can
4	and have a great weekend. Thanks. Signed, Joe
5	Gallagher."
6	A. Uh-huh.
7	Q. Did I read that correctly?
8	A. Correct.
9	Q. What does that what event is
10	that referring to?
11	A. I it's referring to the case
12	against socialism event.
13	Q. And who were the speakers at that
14	again?
15	A. Morgan Zegers, George Phillips
16	and Michael Vasquez.
17	Q. Okay. So you had three speakers
18	then?
19	A. We had three speakers, yep.
20	Q. Got you. And did you meet with
21	Officer Gallagher before that event?
22	A. Yes.
23	Q. And what was discussed? What did
24	he say, what did you say?
25	A. If I remember correctly, it was

	Page 168
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	just general concern about the event. If there were
3	going to be any protestors or anything like that to
4	our event. And that he was going to attend in plain
5	clothes.
6	Q. Okay. Got you. Did the event
7	occur?
8	A. Yes.
9	Q. And what occurred at the event?
10	What happened?
11	A. Well, we had our three speakers
12	lined up. We had a little disruption from some
13	individuals who were obnoxiously laughing, but that
14	was the extent of it and everyone went home after
15	forty-five minutes.
16	Q. Okay. How many attendees were
17	there?
18	A. Approximately, forty-five, maybe
19	fifty.
20	Q. Were they College Republican
21	members, community members, other students, who was
22	there?
23	A. I believe it was open to the
24	public, if I remember correctly, so.
25	Q. Okay. And were any university or

	Page 169
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	University Police representatives present?
3	A. I believe Joe Gallagher sat in
4	plain clothes in the back.
5	Q. Okay. Did was he the only
6	university representative present?
7	A. I don't remember.
8	Q. Did any university representative
9	impede the event at all?
10	A. No.
11	Q. Okay. In Investigator
12	Gallagher's email I just read, you see it refers to
13	P.L.O.T. and Associated Student Groups. Does that
14	referred to PLOT?
15	A. Yes.
16	Q. What is PLOT?
17	A. PLOT stands for Progressive
18	Leaders of Tomorrow.
19	Q. And what is that?
20	A. That is a community group outside
21	of campus who has done far left activism and has been
22	known to crash events.
23	Q. Okay. And were there any PLOT
24	members, if you know, at this event?
25	A. I don't know if there were any or

Associated Reporters Int'l., Inc.

Page 170 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 not, no. 3 And what does Joe Gallagher refer 0. 4 to when he says Associated Student Groups, if you know? 5 I don't know. 6 Α. 7 Q. Okay. Did you have any understanding what he was referring to? 8 9 Α. I don't know, no. 10 Q. Okay. All right. Referring to 11 PLOT --12 Uh-huh. Α. 13 0. -- if we might. Do you have any 14 personal knowledge regarding whether Defendant Brian 15 Rose had any direct contact or communication with any 16 representative of PLOT during the calendar year 2019 17 up to and including the tabling event and the Laffer 18 event? 19 Α. I don't know if he has or hasn't, 20 no. 21 Okay. Do you have any personal Q. knowledge regarding whether Defendant Harvey Stenger 22 23 has had any direct contact or communication with any 24 representative of PLOT during the calendar year 2019 25 up to and including the table -- during the calendar

	Page 171
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	year 2019 up to and including the tabling event and
3	the Laffer event?
4	A. I don't know.
5	Q. Okay. Same question for
6	Defendant John Pelletier. Do you have any personal
7	knowledge whether Chief Pelletier had any direct
8	contact or communication with any representative of
9	PLOT during the calendar year 2019 up to and
10	including the table event and Laffer event?
11	A. No, I don't know.
12	Q. Okay. In the caption, which is
13	right next to you in Exhibit One, there's also a
14	defendant named College Progressives.
15	A. Uh-huh.
16	Q. What is College Progressives?
17	A. They are the far left alternative
18	to the college democrats on campus.
19	Q. Okay. So student group?
20	A. They're a student group, yes.
21	Q. All right, got you. Do you have
22	any personal knowledge who the members were in fall
23	of 2019 of College Progressives?
24	A. One member, I know the first name
25	of is, I believe it's Dava her name is.

	Page 172
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Morthy?
3	A. I don't know the last name.
4	Q. Okay.
5	A. I we only I only knew her
6	as Dava.
7	Q. Okay. Dava. Were you did you
8	have a any sort of relationship with Dava? Were
9	you friends with her? Were you
10	A. No, I have never talked to her.
11	Q. Oh, you've never talked to her?
12	A. No.
13	Q. Okay. Got you. You just knew
14	she was a College Progressive?
15	A. I knew she was a College
16	Progressive member, yes.
17	Q. Okay. Got you. Do you have any
18	personal knowledge regarding whether Defendant Brian
19	Rose had any direct contact or communication with any
20	representative of College Progressives during the
21	calendar year 2019 up to and including the table
22	event and Laffer event?
23	A. I'm not Brian Rose, so I don't
24	know.
25	Q. Okay. You don't know?

Associated Reporters Int'l., Inc.

Page 173 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 Α. I don't know. 3 Ο. Okay. Do you have any personal 4 knowledge regarding whether Defendant Harvey Stenger 5 had any direct contact or communication with any representative of College Progressives during the 6 7 calendar year 2019 up to and including the table event and Laffer event? 8 9 Α. I don't know. 10 And finally, do you have any 0. 11 personal knowledge whether Defendant John Pelletier, 12 the police chief, had any direct contact with any 13 representative of the College Progressives during the calendar year 2019 up to and including the table 14 event and the Laffer event? 15 16 Not that I know of. Α. 17 Q. Okay. Let's move on to a new 18 exhibit. I think this one's readable. 19 20 Α. I hope so. 21 This has been identified as Q. 22 Defendants' Exhibit Eight. This is from Defendants' 23 Rule 26 disclosure Bate stamp page twelve ninety-two. 24 And it appears to be an email between you and Joe

Gallagher, dated October 28th, 2019. Do you

25

		Page 174
1		B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2		recognize this exchange?
3		A. Yes.
4		Q. And what is it?
5		A. I believe I was meeting with Joe
6		Gallagher and dropping off coffee for him and the
7		officers.
8		Q. Okay. That meeting occurred?
9		A. Yes.
10		Q. What was discussed?
11	,	A. I don't remember specifics, but I
12		remember giving them the coffee.
13		Q. Okay. But did you talk about
14		anything, what was the point of the meeting other
15		than coffee?
16		A. I don't remember, no.
17		Q. Were you talking about the it
18		says, John this is the Monday October 28, 2019
19		nine fifty-two a.m., from Joe Gallagher. It says,
20		"John, any chance you will be on campus today? I
21		would like to meet up with you if possible to talk
22		ahead of our of your event this evening. Let me
23		know. Thanks, Joe." Was October 28th the date of
24		the case against socialism?
25		A. I don't remember if it was the

	Page 175
1.	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	date, but I am going to guess it was.
3	Q. Okay. Or it could have been
4	another event on that day?
5	A. Potentially, I don't remember.
6	Q. Okay. Got you. And you don't
7	remember what you and Joe talked about?
8	A. No, I do not.
9	Q. Okay. Fair enough. Moving on to
10	Defendants' Exhibit Nine.
11	A. Thank you.
12	Q. I'll state for the record that
13	this is Bate stamped page one thirty-two from the
14	Plaintiffs' disclosures. It is a one-page exhibit.
15	And I will ask you to review it. And then let me
16	know once you have had an opportunity to do so.
17	A. I have reviewed the document,
18	yes.
19	Q. Okay. You'll see at the top it
20	has the title, "Dr. Laffer event," correct?
21	A. Uh-huh.
22	Q. And you sent this email to P.C.
23	Scaganelli (sic)?
24	A. Preston Scagnelli, yes.
25	Q. Preston Scagnelli on November 21,

	Page 176
.1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	2019?
3	A. Correct.
4	Q. Do you remember why you sent this
5	to Preston?
6	A. I don't remember.
7	Q. Okay. And it's an email from Joe
8	Gallagher. And he says to you, "John, glad your
9	event went well last night in regards to the Arthur
10	Laffer event. If you speak to his representatives,
11	you may want to inquire if he has any security
12	concerns and get a list of prior appearances of
13	college campuses. I generally reach out to those
14	locations to see what kinds of issues, if any, they
15	experienced. Thanks again for the coffee. Joe."
16	Did you receive this email, sir, on October 29, 2019?
17	A. It appears to be yes.
18	Q. Did you have any independent
19	recollection of this email?
20	A. I don't have an independent
21	recollection, no.
22	Q. Do you know why Investigator
23	Gallagher was making this inquiry about Dr. Laffer?
24	A. I do not know, no.
25	Q. He would know, right?

	Page 177
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes.
3	Q. Okay. Did you respond to this
4	email?
5	A. I don't remember if I did or not.
6	Q. Okay. Let's let's go back to
7	the complaint. That's Exhibit One, which should be
8	right in front of you.
9	A. Uh-huh.
10	Q. And I am going to direct your
11	attention to paragraphs forty-seven and forty-eight,
12	which are located beginning on page twelve of the
13	complaint. Then going on to page thirteen of the
14	complaint, which again is Exhibit One.
15	A. Uh-huh.
16	Q. I will read paragraphs forty-
17	seven and forty-eight to you.
18	A. Uh-huh.
19	Q. Paragraph forty-seven. "On
20	Thursday, November 14, 2018, College Republicans
21	organized a tabling event in a high traffic area of
22	SUNY Binghamton's campus known as the spine. College
23	Republicans table was not blocking access to
24	buildings or pedestrian traffic."
25	Paragraph forty-eight. "As they and

	Page 178
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2 ,	many other student organizations had done previously,
3	College Republicans did not obtain a permit from the
4	student association to table on this date." Did I
5	read that correctly, sir?
6	A. Correct.
7	Q. Where was this tabling event
8	held?
9	A. It was held at the spine.
10	Q. Okay. And we've already talked
11	about what the spine was, correct?
12	A. Correct.
13	Q. And what time did the table get
14	set up?
15	A. I don't remember specifically
16	what time the table was set up. It was in the
17	morning.
18	Q. Does paragraph fifty refresh your
19	recollection, and I'll read that into the record. It
20	says, "Members of College Republicans arrived on the
21	spine at approximately ten a.m. and tabled for close
22	to three hours without incident during which time
23	they engaged with student passerby regarding the
24	upcoming Dr. Laffer event."
25	A. Ten a.m. sounds about right for

	Page 179
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	the
3	Q. Okay. Were you there?
4	A. For the beginning of the tabling,
5	yes.
6	Q. Okay. So you got there and help
7	set up?
8	A. Yes.
9	Q. And what was the purpose of this
10	tabling?
11	A. The purpose of the tabling was to
12	hand out flyers where we had a Q.R. code for the
13	event.
14	Q. Okay.
15	A. So people could see where the
16	event was. And to just let students know the event
17	was happening on campus and to hand out free hot
18	chocolate.
19	Q. Okay. How many flyers did you
20	hand out?
21	A. I don't know.
22	Q. How many flyers did you make?
23	A. I don't know.
24	Q. Okay. Was it more than ten?
25	A. More than ten, I would say.

	Page 180
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Was it more than fifty?
3	A. I would say more than fifty.
4	Q. Was it more than one hundred?
5	A. I would say more than a hundred,
6	yes.
7	Q. Was it more than one hundred and
8	fifty?
9	A. That I don't know.
10	Q. Okay. So there's a lot of you
11	handed out a lot of flyers that day, correct?
12	A. Correct.
13	Q. Okay. Was and the purpose of
14	the tabling was to hand out those flyers, correct?
15	A. And to pass out hot chocolate.
16	Q. Hot chocolate. Did you pass out
17	hot chocolate?
18	A. Yes.
19	Q. Okay. How much hot chocolate did
20	you pass out?
21	A. Approximately eighty dollars'
22	worth.
23	Q. Okay. Got you. You purchased
24	hot chocolate beforehand?
25	A. We yes.

	Page 181
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Who who spent the money for
3	that hot chocolate?
4	A. Jeff Coghlen gave us the money to
5	buy the hot chocolate, if I remember correctly.
6	Q. Got you. All right. Okay. So
7	it's Coghlen's money. And you were not present for
8	the entire tabling event?
9	A. Correct.
10	Q. You were there for the ten a.m.
11	setup, right?
12	A. Correct.
13	Q. And how long did you hang out
14	before you left?
15	A. I believe it was about two hours
16	before I had a class.
17	Q. So you went to class?
18	A. I went to class, yes.
19	Q. What time was your class?
20	A. I don't remember specifically
21	what time.
22	Q. Could it have been noon, twelve
23	thirty or
24	A. Twelve thirty, noon, sounds about
25	right.

	Page 182
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. And how long were classes
3	generally, or do you know how long that class was?
4	A. I don't
5	Q. Thinking back to ancient times
6	when I took classes, some of them could be an hour,
7	some of them could be three hours.
8	A. I don't remember what how long
9	that class was. I could tell you the class name but
10	I can't tell you.
11	Q. And what class was it?
12	A. It was Jews and Crime, it was
13	called.
14	Q. Jews and Crime?
15	A. Yes.
16	Q. Okay. Got you.
17	A. It was put on by the Judaic
18	Studies Department.
19	Q. Got you. So you attended that
20	class?
21	A. Yes.
22	Q. And then did you go anywhere af -
23	- where was that class located?
24	A. It was held I don't remember
25	specifically where it was held. It was held across

	Page 183
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	the spine.
3	Q. Okay.
4	A. I know that.
5	Q. All right. So it's accessible
6	from the spine?
7	A. Correct.
8	Q. And when you were sitting in
9	class, did you have a view through the window of the
10	tabling event?
11	A. I did not, no.
12	Q. Okay. And the class, what's the
13	minimum amount of time classes are at B.U.?
14	A. Minimum is about an hour an
15	hour, I would say forty-five minutes, but
16	Q. Okay. Shortest it could have
17	been would be about an hour, right?
18	A. Correct.
19	Q. So you were gone till at least
20	one o'clock?
21	A. I was gone past to one thirty, I
22	know that.
23	Q. Past one thirty.
24	A. Yeah.
25	Q. Okay. And then you did you

	Page 184
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	return to the tabling event at some point?
3	A. Yes.
4	Q. Okay. And the complaint you've
5	read before, correct?
6	A. Correct.
7	Q. And it discusses a disruption of
8	the tabling event?
9	A. Correct.
10	Q. Okay. Was the disruption
11	occurring before you left for class?
12	A. It was after.
13	Q. After.
14	A. After I left for class.
15	Q. A simple question.
16	A. Yeah.
17	Q. Was it happening when you left
18	for class?
19	A. No.
20	Q. Okay. And was there a disruption
21	happening when you returned to the tabling event?
22	A. Correct, yes.
23	Q. Yes?
24	A. Uh-huh.
25	Q. What time did you return to the

	Page 185
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	tabling event?
3	A. I don't remember specifically,
4	after my class was over, I ran on down.
5	Q. Okay. Sometime in the one
6	o'clock hour?
7	A. After one, one o'clock, I would
8	say so maybe two fifteen.
9	Q. Okay.
10	A. Okay.
11	Q. Got you.
12	A. After Jews and Crime ended, I
13	immediately ran down.
14	Q. Oh, you ran. Why did you run,
15	did someone tell you something was going on?
16	A. I so I got a call, I got a
17	text on my laptop that appeared saying hey, give me a
18	quick call. And it was from Jon Lizak. I stepped
19	outside, I called Jon Lizak, he said everything was
20	fine. There were just some people heckling him and
21	Lacey at the table. He said not to worry about it.
22	He just wanted to let me know. So I went back.
23	And at the end of class, I overheard
24	two students saying there was a large commotion at
25	the spine.

	Page 186
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Oh, okay. And that's why you
3	ran?
4	A. That's why I ran.
5	Q. Do you still have a copy of that
6	text from Jon?
7	A. Potentially.
8	Q. Okay. I'm going to ask that the
9	witness search for texts from Jon. Do you know what
10	time the text arrived?
11	A. I don't know. I remember I
12	believe it was during my class. Because I took
13	stepped out and took a call, I I remember
14	correctly.
15	Q. Okay. Okay. What describe
16	for me what was at the table, your table?
17	A. Our table?
18	Q. Yeah.
19	A. If I remember correctly, we had
20	the hot chocolate. We had the flyers about Dr.
21	Laffer. We had napkins and we had cups.
22	Q. Okay. Were there any cutout
23	cutouts of any individuals?
24	A. I believe that was at the Turning
25	Point U.S.A. table.

	Page 187
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Turning Point U.S.A.
3	table, what's that?
4	A. Turning Point U.S.A. is a
5	501(c)(3) nonprofit group that comes to campuses and
6	does student clubs and things like that. They
7	organize a club on campus.
8	Q. Was there a Turning Point U.S.A.
9	club on campus at B.U. in November of 2019?
10	A. Yes.
11	Q. Okay.
12	A. They just made one.
13	Q. Okay. So that was another
14	student group, right?
15	A. Yes.
16	Q. And that student group was
17	tabling on the same date?
18	A. Yes, next to us.
19	Q. Okay. And were any College
20	Republicans well, first of all, were you a member
21	of Turning Point U.S.A. student group?
22	A. No.
23	Q. Do you know if any College
24	Republicans in your group at that time were members
25	of Turning Point U.S.A. student group?

	Page 188
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes.
3	Q. Who?
4	A. Lacey Kestager.
5	Q. Okay. Anyone else?
6	A. Jon Lizak.
7	Q. Okay.
8	A. That's the only two I know.
9	Q. Okay.
10	A. Off the top of my head.
11	Q. And who is at the tabling events
12	other than you from the College Republicans?
13	A. I believe Jon Lizak and Lacey
14	Kestager.
15	Q. Anyone else?
16	A. Potentially Bryn Lauer and
17	Preston Scagnelli potentially.
18	Q. Okay. When you say potentially,
19	why do you say that? Were they there when setup
20	happened?
21	A. I don't remember specifically.
22	Q. You were there when setup
23	happened?
24	A. Yes.
25	Q. Who helped you set up?

	Page 189
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Jon Lizak. I don't remember who
3	else.
4	Q. Was Lacey there then?
5	A. I don't remember.
6	Q. Who was at the Turning Point
7	U.S.A. table?
8	A. One of their field reps who
9	helped manage some of the clubs across the this
10	kind of coast of the state.
11	Q. What was his name?
12	A. Taylor Syinsky.
13	Q. Okay.
14	A. His name is.
15	Q. Had you met with Taylor before
16	November 14th?
17	A. No.
18	Q. Is that the first time you met
19	him?
20	A. That's the first time I met him.
21	Q. Not a student?
22	A. Not a student.
23	Q. Okay. And were Jon and Lacey
24	also hosting the Turning Point U.S.A. table as
25	members?

	Page 190
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes.
3	Q. Okay. So Jon and Lacey were
4	there, both in their capacity as College Republican
5	members and as Turning Point U.S.A. members?
6	A. As far as I remember, yes.
7	Q. And then the two other people who
8	were there just want to get a list of who is there
9	from from College Republicans. So there was you,
10	there was Lizak, there was Lacey, there was Bryn?
11	A. Bryn.
12	Q. Do you know Bryn was there or are
13	you guessing?
14	A. I I don't remember, but I
15	think she was there, to the best of my recollection.
16	Q. Was she there when you set up?
17	A. I don't remember if she was there
18	when I set up.
19	Q. Was she there when you left for
20	class?
21	A. I don't remember.
22	Q. What is your source of knowledge
23	for the fact that she may have been there?
24	A. When I arrived back, I believe
25	she when I arrived from my class to the table, I

	Page 191
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	believe she was there.
3	Q. Okay. During the time you were
4	there from ten a.m. until class started, who were the
5	College Republicans present?
6	A. Jon Lizak, I know was there, and
7	Lacey Kestager. I don't remember if anyone else was
8	there.
9	Q. Okay. Was John and Lacey behind
10	your table, behind the Turning Point table, both?
11	A. Both.
12	Q. Okay.
13	A. If I remember correctly.
14	Q. And was the chocolate being
15	handed out from your table or from the Turning Point
16	U.S.A. table?
17	A. From our table.
18	Q. Okay. And who was distributing
19	the hot chocolate?
20	A. Jon Lizak and I.
21	Q. Okay. And who was the other
22	member who you thought might have been there for the
23	College Republicans?
24	A. Preston Scagnelli.
25	Q. Preston. And Preston, was he

	Page 192
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	there before you left for class at all?
3	A. That I don't remember.
4	Q. Was he there when you returned?
5	A. I don't remember, but I believe
6	he was.
7	Q. Okay. Were Bryn and Preston
8	Turning Point U.S.A. members?
9	A. I do not know.
10	Q. Was Turning Point U.S.A. have any
11	sort of display at their table?
12	A. Yes.
13	Q. What is Turning Point U.S.A.?
14	A. Turning Point U.S.A. is a
15	501(c)(3).
16	Q. I'm not asking about the
17	corporate status. What is it, what do they promote,
18	what is their purpose?
19	A. They're a organization that helps
20	set up clubs across the campus across the United
21	States on campuses to promote their principles.
22	Q. What are their principles to your
23	understanding? I know you're not a member.
24	A. To my understanding,
25	economically, conservative, pro Second Amendment,

	Page 193
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	general conservative principles, I would say to the
3	best of my understanding. I'm not a member.
4	Q. Okay. Why are you not a member?
5	A. I didn't want to be a member.
6	Q. Why didn't you want to be a
7	member?
8	A. Just a personal choice, I had a
9	lot on my plate at the time.
10	Q. Okay. What was at the Turning
11	Point U.S.A. table, if anything? Did they have
12	flyers, were they promoting the Laffer event, were
13	they doing something else?
14	A. They were doing something else.
15	Q. What were they doing?
16	A. They were they had up there
17	signs that their organization had made, they pre-make
18	signs and they had them up.
19	Q. What were the signs?
20	A. I don't remember.
21	Q. You don't remember?
22	A. I think one of them was no, I
23	don't remember.
24	Q. You don't have any recollection
25	of what their signs were?

	Page 194
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. No, because they produce a lot of
3	different signs.
4	Q. Okay.
5	A. So they're
6	Q. Let me ask you this. Was this a
7	memorable event to you this this event that had
8	occurred at the table?
9	A. It was a scary event that I try
10	not to think about sometimes.
11	Q. Okay. But you don't have any
12	recollection as you sit here today as to what Turning
13	Point U.S.A how far away was that table from
14	yours?
15	A. I don't remember how far, I think
16	it was pretty close.
17	Q. Well, pretty close, can you put
18	yourself back to November 14th, 2019 and tell me how
19	close?
20	A. No, I I don't remember.
21	Q. Was it five feet away?
22	A. I don't remember.
23	Q. Was it ten feet away?
24	A. Again, I don't remember.
25	Q. Lacey and Jon were going back and

	Page 195
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	forth between the tables, is that correct?
3	A. So it had to be pretty close,
4	yeah.
5	Q. Pretty close, right?
6	A. Yeah.
7	Q. Within feet?
8	A. Potentially, I don't
9	Q. Half a football field?
10	A. I would say not half a football
11	field, closer than that.
12	Q. Closer than that?
13	A. Yeah.
14	Q. So less than fifty yards?
15	A. Yeah.
16	Q. Less than twenty feet?
17	A. I don't know. I don't remember.
18	Q. Okay. Did they have pictures of
19	guns at that table?
20	A. Potentially, I don't remember.
21	Q. You don't remember?
22	A. No.
23	Q. Okay. Did they have a poster
24	that said, freedom of choice, pick your gun?
2.5	A. Potentially, I don't remember. I

	Page 196
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	do know that Lacey brought her cardboard cutout of
3	Donald Trump.
4	Q. Is that at your table or Turning
5	Point's table?
6	A. I believe it was at Turning
7	Point's table.
8	Q. How far away was that from your
9	table?
10	A. I don't remember.
11	Q. Was Turn okay. So if you're
12	facing out from your table, were you at one side of
13	the spine or the other?
14	A. We were in proximity of each
15	other. Like, maybe I I just don't remember, it
16	was close by. We are on the same side of the spine,
17	but
18	Q. Okay. And you were at the
19	College Republicans table, correct?
20	A. Yes.
21	Q. And was Turning Point to your
22	left or to your right?
23	A. I don't remember.
24	Q. You don't remember whether it's
25	to your left or to your right?

	Page 197
1 .	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. No.
3	Q. Okay. And you don't remember how
4	close it was?
5	A. I don't, no.
6	Q. And you don't remember what they
7	had other than the cutout of Trump and signs they
8	did have signs with guns on them or no?
9	A. I don't remember specifically
10	what their signs were, all I remember is the
11	cardboard cutout of Donald Trump.
12	Q. Okay. Were you aware that there
13	had been a school shooting that day?
14	A. No.
15	Q. Okay. Were you aware that some
16	of the people who disrupted the tabling were offended
17	because a school shooting had occurred that day and
18	Turning Point U.S.A.'s table had pictures of guns on
19	it?
20	A. No.
21	Q. You don't know that. You didn't
22	hear that personally?
23	A. No.
24	Q. Okay. All right. Let's go to
25	paragraph forty-eight of the

	Page 198
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Uh-huh.
3	Q. Did anyone let me ask you
4	this, during the time you were at the table until
5	class started, did anyone protest the table?
6	A. When I was there?
7	Q. Yeah.
8	A. Not that I remember, no.
9	Q. Okay. Did thirty people protest
10	the table while you were there?
11	A. No.
12	Q. Okay. Did anyone express
13	objection anything at your table or Turning Point's
14	table?
15	A. Potentially Turning Points, but
16	people just had
17	Q. What do you mean, potentially?
18	A. I don't remember.
19	Q. Okay.
20	A. They might have tried to engage
21	with the Turning Point table, but I was more focused
22	on handing out flyers with the hot chocolate.
23	Q. Okay. Got you. Let's go to
24	paragraph forty-eight of the complaint.
25	A. Uh-huh.

	Page 199
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. I've already read into the
3	record. It says that you did not obtain a permit
4	from the student association to table. Is that
5	correct?
6	A. Correct.
7	Q. Were you aware of the process for
8	obtaining a permit for tabling on the spine in
9	November of 2019?
10	A. I don't remember.
11	Q. Okay. Well, you don't remember.
12	Was there let me ask you this. Was there a
13	process for obtaining a permit?
14	A. I believe there was.
15	Q. Okay. Well, paragraph forty-
16	eight says there was, right?
17	A. Correct.
18	Q. It says, "As they and many other
19	student organizations had done previously, College
20	Republicans did not obtain a permit from the student
21	association to table on this date." Correct?
22	A. Correct.
23	Q. That's what it says here?
24	A. Uh-huh.
25	Q. Is that true or false?

	Page 200
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. That is true, I believe.
3	Q. Okay. So there was a process for
4	obtaining a permit. Is that correct?
5	A. It appears to be, yes.
6	Q. Had you ever and you've told
7	us earlier today that you've undertaken that process
8	at least once before November of 2019, correct?
9	A. For?
10	Q. A table event.
11	A. Do you mean for the club fair?
12	Q. I I believe that's what you
13	had testified you had done you had obtained a
14	permit for. You said that either the Libertarians or
15	the College Republicans had a permit, right?
16	A. I believe we got permission to
17	table. I didn't think there was a specific permit or
18	
19	Q. Okay. But there's a process for
20	getting a permit, correct?
21	A. It yes.
22	Q. And the College Republicans
23	didn't undertake that process on November 14th, 2019
24	before this tabling began, correct?
25	A. No.

	Page 201
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. All right. Were you familiar
3	with the Be There system?
4	A. I bel is that the process to
5	book rooms?
6	Q. Yes.
7	A. I believe we had a previous
8	exhibit with that showed that was how you booked
9	rooms.
10	Q. Is that how you you obtain
11	permits?
12	A. I don't know.
13	Q. Do you know who Oren Kenyan is?
14	A. No, I don't know.
15	Q. Okay. But you did reserve a room
16	for Dr. Laffer, correct?
17	A. Correct.
18	Q. But you didn't reserve a table
19	for for November 14th, correct?
20	A. Correct.
21	Q. Did you ever try to obtain a
22	permit for the tabling event on November 14th?
23	A. I don't remember.
24	Q. Okay. So you may have tried, you
25	may not have?

	Page 202
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yeah, I don't remember.
3	Q. Did anyone deny you a permit?
4	A. I don't remember.
5	Q. Would you remember if someone had
6	said no, you can't have a permit to table and you
7	tabled anyway?
8	A. I don't know. I don't remember.
9	Q. Is it fair to say you never even
10	tried to get a permit?
11	A. I don't remember.
12	Q. Okay.
13	MR. CRAIG: Objection, asked and
14	answered.
15	BY MR. MOORE: (Cont'g.)
16	Q. This says, "As they had done
17	previously, College Republicans did not obtain a
18	permit from the student association to table on this
19	date." When had the College Republicans, if you
20	know, had tabled previously without a permit on the
21	spine?
22	A. I believe it was for the the -
23	- again, I don't remember if it was for the College
24	Libertarians or College Republicans, but for Club
25	Fest. And I don't remember if we got a permit for

	Page 203
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Constitution Day to table.
3	Q. Okay. Club Fest and Constitution
4	Day are two separate tables, right?
5	A. Yes.
6	Q. Were they on the spine? Club
7	Fest wasn't, right?
8	A. Club Fest wasn't, Constitution
9	Day was.
10	Q. Okay. Was Constitution Day
11	was in fall of 2018? That's what your previous
12	testimony was?
13	A. I believe it was in fall of 2019.
14	Q. Okay. Let's backtrack then,
15	because my understanding, and your counsel can
16	correct me if I had this wrong, was that you had
17	testified that it was fall of 2018 that the
18	Constitution Day tabling was when you first got
19	there?
20	A. No, Constitution Day was fall
21	2019.
22	Q. Okay. Fall of 2019. And that
23	was on the spine?
24	A. Yes.
25	Q. Did you obtain a permit

	Page 204
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't
3	Q for that tabling?
4	A. I don't remember.
5	Q. Okay. Okay. So can you think of
6	any occasion where as contemplated in paragraph
7	forty-eight, the College Republicans had tabled on
8	the spine without a permit?
9	A. I don't remember.
10	Q. So you can't think of an example?
11	A. I cannot.
12	Q. Okay. Can you tell me, and list
13	them for me, what other student organizations had
14	previously not obtained a permit from student
15	association to table on the spine?
16	A. On the spine specifically?
17	Q. Well, let's start with the spine,
18	then we can go to other places.
19	A. I don't know of that I don't
20	know off the top of my head, no.
21	Q. You don't know of any examples of
22	other student organizations who had not taped who
23	had not obtained a permit and tabled on the spine?
24	A. Correct, I don't.
25	Q. Do you know of any other student

v	Page 205
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	organizations who had tabled anywhere on campus
3	without obtaining a permit?
4	A. I believe, if my recollection
5	recalls, College Progressives had protested outside
6	without a permit or without reserving when B.A.E.
7	systems came to speak to students.
8	Q. Okay. But you don't know if that
9	was a tabling?
10	A. Well, they have the I believe
11	B.A.E. systems had the room booked. And I believe
12	they showed up outside the event. So without a
13	permit.
14	Q. Okay. So the B.A. Systems, is
15	that a defense contractor?
16	A. Yes, B.A.E. Systems.
17	Q. B.A.E. Systems? And when did
18	that occur?
19	A. I believe that happened that
20	semester, fall.
21	Q. Okay. And there was a protest
22	from the College Progressives, to your understanding?
23	A. To my understanding, yes.
24	Q. Were you present?
25	A. I walked by, I remember because

	Page 206
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	it was right near the marketplace.
3	Q. Got you. And there was the
4	room was near the marketplace?
5	A. Yes.
6	Q. Okay. And what did you see when
7	you walked by?
8	A. I saw people with signs, and I
9	remember hearing because B.A.E. Systems had came
10	multiple times. If I remember, I heard they had
11	shouted down one of the speakers at one point.
12	Q. Okay. Was this fall, fall of
13	2019 when they were shouted down a speaker?
14	A. I be yes, if I remember
15	correctly.
16	Q. They were holding signs?
17	A. They were holding signs outside,
18	yes.
19	Q. Did they man a table outside?
20	A. I don't believe they had a table
21	set up.
22	Q. Okay. Okay. My question was,
223	are you aware of any other student groups who tabled
24	on campus without a permit prior to your tabling on
25	November 14th?

	Page 207
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. So by tabling do you mean
3	specifically have to have a table, or do you mean
4	the student groups conferring with students and as
5	they walk by
6	Q. I'm referring to paragraph forty-
7	eight, it says, I'll read it again. "As they and
8	many other student organizations had done previously,
9	College Republicans did not obtain a permit from the
10	student association to table on this date." What is
11	your understanding of what you did on that date? You
12	tabled, what does that mean to you?
13	A. It means, we stood with our
14	flyers and hot chocolate and things and handed them
15	out.
16	Q. From a?
17	A. From a table, yes.
18	Q. Okay. So by tabling, we're
19	referring to setting up a table and engaging with
20	passersby, correct?
21	A. Correct.
22	Q. Okay.
23	A. Yeah.
24	Q. So my question is, are you aware
25	of any other student organization, other than you and

	Page 208
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Turning Point U.S.A. on November 14th, who tabled
3	without a permit, prior to November 14th, 2019?
4	A. Not that I can think of off the
5	top of my head.
6	Q. Okay. Was there any other table
7	set up in the proximity of the College Republicans'
8	table other than Turning Point U.S.A. that day?
9	A. Not that I can remember, no.
10	Q. You were the only two tables out
11	there?
12	A. Yes.
13	Q. Okay. On November 14th, 2019,
14	were there any other members other than Lacey and Jon
15	that were members of of the College Republicans
16	that were members of Turning Point U.S.A.?
17	A. Could you
18	MR. CRAIG: Objection, asked and
19	answered.
20	BY MR. MOORE: (Cont'g.)
21	Q. Yeah. Are you aware of I'm
22	not sure if you gave me a complete answer. You said
23	that Jon and Lacey were members of both the College
24	Republicans and Turning Point U.S.A., correct?
25	A. Uh-huh.

	Page 209
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Were there any other College
3	Republicans members in November 2019, who are also
4	members of Turning Point U.S.A.?
5	A. Not that I know of, I don't know.
6	I wasn't a member. So I don't.
7	Q. Okay. Just asking what you know,
8	that's all. Did College Republicans coordinate the
9	tabling events with T.P. U.S.A. on the spine before
10	it occurred; in other words, did you both know, the
11	other would be there?
12	A. Yes, we both knew the other were
13	going to be there.
14	Q. How how was that coordinated?
15	A. I believe I don't remember
16	how, I don't remember how.
17	Q. Well, what how did you come to
18	know that there were tabling that day, the same day
19	you were?
20	A. I believe I was in contact with
21	Lacey who said she wanted to table and that the field
22	rep from Turning Point was coming down to help her
23	with it. So we
24	Q. Okay.
25	A decided to be next to each

	Page 210
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	other.
3	Q. So Lacey made the decision to
4	have Turning Point U.S.A. there as far as you know?
5	A. To the best of my recollection.
6	Q. Okay. Now, was there any
7	communication between any members of College
8	Republicans and any outsiders too, but members of
9	College Republicans about the tabling event prior to
10	tabling event?
11	A. I believe we told Raj that we
12	were going to be tabling and passing out hot
13	chocolate to promote the event.
14	Q. Okay.
15	A. Because we wanted to know what
16	our marketing was for the event.
17	Q. Did he send you any materials to
18	hand out?
19	A. I don't remember, I don't believe
20	so.
21	Q. Okay.
22	A. I think he just approved our
23	flyer.
24	Q. Okay. So you created a flyer,
25	you ran it past Raj, he said that looks good?

	Page 213
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes.
3	Q. In sum and substance in there
4	A. Uh-huh.
5	Q that's the flyer you used,
6	correct?
7	A. Correct.
8	Q. You had twenty-two members in
9	fall of 2019?
10	A. At the end of '20, fall of '20.
11	Q. '19?
12	A. Yes.
13	Q. Okay. On November 14th, 2019,
14	how many members did you have?
15	A. That I do not know. It was
16	sporadic.
17	Q. Okay.
18	A. We didn't have regular
19	attendance.
20	Q. Well, you had a total of twenty-
21	two at the end of semester?
22	A. Uh-huh.
23	Q. Which wasn't long after that,
24	right?
25	A. Correct.

	Page 212
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Did membership increase
3	after the Laffer event?
4	A. Membership did increase, yes.
5	Q. By what proportion?
6	A. Maybe eight.
7	Q. Okay.
8	A. Maybe.
9	Q. So if we say there were twenty-
10	two at the end, is it fair to say that there are
11	approximately fourteen at the time of the tabling?
12	A. Fourteen regular, potentially,
13	regular attendee. We had, like I said, people coming
14	in and out sometimes, I think
15	Q. I'm just trying to come up with a
16	rough number.
17	A. Correct, yeah.
18	Q. Try to refresh your recollection
19	here.
20	A. Uh-huh.
21	Q. So is fourteen a fair guess as to
22	the number of College Republicans that were in the
23	group as of November 14th, 2019?
24	A. Yes.
25	Q. Okay. Did you communicate the

	Page 213
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	College Republicans intention to table on November
3	14th, 2019 to your membership?
4	A. Yes.
5	Q. And how was that communicated?
6	A. I don't remember how I
7	communicated. It might have been set at a meeting
8	that we were going to be tabling at that time.
9	Q. Was there an email to membership?
10	A. Potentially, I don't remember
11	how.
12	Q. Did you ever email to membership
13	during your presidency in fall of 2019? In other
14	words, would you ever send a group email out to the
15	email addresses of the various members?
16	A. Yes.
17	Q. Okay. And do you still was
18	would that be from your College Republicans email
19	address, from your student email address, from your
20	Gmail email address, or something else?
21	A. It would have been through the
22	College Republicans email because they had access to
23	the list server.
24	Q. Okay. So again, we're going to
25	make a request for any organizational emails or

	Page 214
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	communications pertaining to either the tabling event
3	or the Laffer event.
4	A. Okay.
5	Q. And also, quite frankly, that
6	does case against socialism as well just to see how
7	it was done.
8	Were you involved in any other
9	coordination with Turning Point U.S.A. other than
10	Lacey's involvement?
11	A. I believe she was having some
12	difficulty getting contact with Taylor Syinsky. So
13	she asked if I could also just give him a call to see
14	what like, to reach out about club materials and
15	things like that.
16	Q. Taylor is the guy from
17	A. Turning Point, yes.
18	Q from T.P. U.S.A.?
19	A. Yes.
20	Q. T.P. U.S.A. is short for Turning
21	Point U.S.A.?
22	A. Correct.
23	Q. Okay. Had you known Taylor from
24	T.P. U.S.A. prior to November 14th, 2019?
25	A. No.

	Page 21.
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Well, how did you come to be able
3	to reach out to him?
4	A. Lacey asked if I could give him a
5	call, because she was he was supposed to be the
6	field rep. And I asked if he planned on sending
7	materials down to Lacey and things like that.
8	Q. Okay. So you had a phone did
9	you have a phone call with Taylor?
10	A. I believe so.
11	Q. Okay. And what was what was
12	discussed during what did you say, what did he
13	say?
14	A. I believe it was just asking if
15	he was going to send out materials to start the club
16	for Lacey, and what was going on with that, because
17	she asked for my assistance in that.
18	Q. When was this, November 2019 or
19	before that?
20	A. I believe it was before that.
21	Q. Okay. Would have been October
22	'19, September '19?
23	A. Probably October, but I don't
24	remember.
25	Q. Okay. And when you say send down

	Page 216
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	materials, what materials did he send out?
3	A. I believe he had posters and
4	things. Turning Point's known for sending out a
5	package with some of their pins, posters, stickers,
6	things like that.
7	Q. Okay. And did you receive those
8	materials?
9	A. I don't remember.
10	Q. Were they sent?
11	A. I'm not in Turning Point U.S.A.
12	So if they were sent, they were sent to Lacey.
13	Q. Okay. So she she received the
14	materials?
15	A. I don't know if she did. She
16	just asked me to talk to see if I could get in
17	contact with him because he was a little hard to
18	reach.
19	Q. Okay. So tell me anything more
20	you can remember about the contact with Taylor?
21	A. I don't remember any contact at
22	that point, other than just calling to set him up
23	with Lacey.
24	Q. Okay.
25	A. Because he was because of

	Page 217
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	difficulty.
3	Q. All right. So I've already read
4	paragraph fifty. But this paragraph, paragraph fifty
5	from Exhibit One, and it says you table for close to
6	three hours without incident. Is that accurate?
7	A. To the best of my recollection,
8	yes.
9	Q. And what occurred during those
10	three hours?
11	A. We handed out hot chocolate,
12	people took the hot chocolate, and I passed out a lot
13	of flyers.
14	Q. Okay. Nothing else you can
15	remember?
16	A. No.
17	Q. Okay. Was there any plan on how
18	long the tabling event would occur?
19	A. I believe we wanted to table for
20	about five hours.
21	Q. And so start at ten a.m., go to
22	about two p.m., is that the plan?
23	A. Three p.m., I believe, but three
24	or two p.m., yeah.
25	Q. Okay. So there was a general

	Page 218
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	plan to go to about two or three p.m., correct?
3	A. Correct.
4	Q. All right. Was there anything
5	memorialized in writing regarding that plan?
6	A. Not that I can think of.
7	Q. Okay. And were there any
8	negative interactions with passers-by or protests
9	before one p.m., on November 14th, 2019?
10	A. Not that I can recall.
11	Q. Did you personally contact
12	university officials or B.U. police before one p.m.,
13	before you headed off to
14	A. No.
15	Q class?
16	A. No.
17	Q. Okay. And
18	MR. CRAIG: Objection, I think facts
19	not he didn't testify that he left at one p.m.
20	MR. MOORE: Okay. I just said before.
21	I
22	MR. CRAIG: Okay. Yeah, I just
23	BY MR. MOORE: (Cont'g.)
24	Q. One p.m I'll say this.
25	A. Uh-huh.

	Page 219
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Before you left for class, did
3	you have any contact with anybody from the university
4	or University Police?
5	A. Not that I can recall.
6	Q. Did you ever tell the University
7	Police that you were having this tabling event?
8	A. I don't remember, not that I can
9	recall, no.
10	Q. Okay. Did you ever reach out to
11	Joe Gallagher and say, hey, listen, we're doing a
12	tabling?
13	A. Not that I can recall.
14	Q. Okay. And Joe had expressed
15	concern about your case against socialism, that there
16	could be a protest to that, correct?
17	A. Correct.
18	Q. Did did you think it might be
19	a good idea to let him know that you were partnering
20	with Turning Point U.S.A. to do a tabling, so he
21	would be aware of that?
22	A. No.
23	Q. Why?
24	A. There was no problem with the
25	case against socialism or anything. And we are a

	Page 220
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	student group, so we thought we could table in a safe
3	environment.
4	Q. Okay. And did you have any
5	advanced knowledge of what sort of signage that
6	Turning Point USA would have on site?
7	A. No, not that I can recall.
8	Q. Did you ever look over and see
9	what the signs were? I know you said you can't
10	remember what the signs were.
11	A. At some point, I probably looked
12	over. They were right they were next to us, but I
13	don't remember specifically what they said.
14	Q. Okay. You don't remember whether
15	they concerned guns?
16	A. That's a I mean, Turning Point
17	U.S.A. is known for their Second Amendment. So if
18	you told me they had posters with guns up, sure, that
19	sounds reasonable, but I'm not sure what specific
20	posters they had out.
21	Q. Okay. Paragraph fifty-one, it
22	says, "At approximately one thirty p.m., a mob of
23	Defendant College Progressives confronted College
24	Republicans over the contents of their tabling.
25	College Progressives incited other members to join

	Page 221
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	the mob by sending messages to group chat rooms with
3	numerous other students." Did I read that correctly?
4	A. Correct.
5	Q. Were you present when this
6	occurred at one thirty p.m.?
7	A. No, I was in class.
8	Q. Okay. And so you don't know how
9	many people showed up initially to confront
10	A. No, I was in class.
11	Q College Republicans? And you
12	don't have any personal knowledge of when this began?
13	A. No, I was in class.
14	Q. Okay. In your opinion, did the
15	individuals who protested the tabling event have a
16	First Amendment right to do so?
17	A. Can you repeat the question?
18	Q. In your opinion
19	A. Uh-huh.
20	Q did the individuals who
21	protested the tabling event have a First Amendment
22	right to do so?
23	MR. CRAIG: I object, calls for a
24	legal conclusion, but you can answer.
25	MR. MOORE: I made sure I asked about

	Page 222
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	his opinion.
3	THE WITNESS: They certainly had a
4	right to disagree with us. But they certainly didn't
5	have a right to come up and start destroying our
6	materials
7	BY MR. MOORE: (Cont'g.)
8	Q. Okay.
9	A and table.
10	Q. But did they have a right to
11	express their disagreement with you other than
12	destroying?
13	A. They had a right to
14	Q. Okay.
15	A protest us in a safe way,
16	yes.
17	Q. Okay. And did you personally
18	contact the police at any point after this protest
19	began?
20	A. I don't remember.
21	Q. So you don't remember having any
22	contact with the police before they arrived?
23	A. I no, I was in class. So
24	after class, are you talking about?
25	Q. Yeah.

	Page 223
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Potentially I made a call. I
3	don't remember though.
4	Q. John called you, correct?
5	A. John called me in class, yes.
6	Q. And he told you something was
7	happening, right?
8	A. He told me that there were some
9	protesters and that was it.
10	Q. Okay.
11	A. And that everything was fine.
12	Q. Did you call the police at that
13	point?
14	A. No.
15	Q. Okay. And then afterwards, you
16	heard somebody leaving class, say there was something
17	going on in the spine, correct?
18	A. They said there yes.
19	Q. What did they say again?
20	A. I don't remember the specifics,
21	but they said there was a mob of people.
22	Q. Okay. And when you arrived back
23	on the scene, what did you observe?
24	A. I observed campus police creating
25	a barrier around where the tables were supposed to

	Page 224
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	be. And I observed a lot of screaming and shouting
3	and people getting very aggressive trying to get to
4	the tables.
5	Q. Okay. Got you. So the police
6	were there when you arrived?
7	A. Correct.
8	Q: You didn't call them? You didn't
9	summon the police to the scene, correct?
10	A. Correct.
11	Q. Okay. And then paragraph fifty-
12	five, I'll read that to the record. It says, "U.P.D.
13	arrived on the scene. And instead of dispersing the
14	mob and protecting College Republicans right to free
15	speech as the written regulations required applied
16	the speech suppression policy by demanding that
17	College Republicans leave the spine while the College
18	Progressive chanted, pack it up." Did I read that
19	correctly?
20	A. Correct.
21	Q. You were there when the police
22	appeared, correct?
23	A. Correct.
24	Q. And when you arrived, they were
25	standing between the protesters and the College

	Page 225
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Republicans?
3	A. Correct.
4	Q. Okay. And what time is this?
5	A. I don't right after my class.
6	Q. Okay. Whatever time that was?
7	A. Whatever time my class ended.
8	Q. Okay. And how many police were
9	there?
10	A. I don't remember.
11	Q. And you don't know who called
12	them?
13	A. I don't.
14	Q. Okay. Did you have any personal
15	conversations with the police?
16	A. Yes.
17	Q. And which which officers did
18	you speak with?
19	A. I don't remember the specific
20	officers. But I wanted to get through to make sure
21	my club members were safe.
22	Q. Okay.
23	A. So I told an officer, I was the
24	president of the College Republicans who were tabling
25	and that I needed to get through to make sure they

	Page 226
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	were safe.
3	Q. And what did he say?
4	A. He helped me get through the mob
5	to make sure they were safe.
6	Q. Okay. And were they safe?
7	A. Lacey had her hat thrown off and
8	
9	Q. What was her what did her hat
10	say?
11	A. I believe it was make America
12	great again.
13	Q. Okay. And did you hear the
14	police say anything else?
15	A. I believe I don't remember the
16	police saying anything, no, not to my best of my
17	recollection.
18	Q. Did anyone did the police say
19	anything about whether you had reserved space that
20	day?
21	A. Not to that I remember, no.
22	Q. Did anyone else said anything
23	about whether you had reserve space that day?
24	A. At that time that I arrived
25	there?

	Page 227
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Yeah. Since you when you got
3	there, did you hear anybody say anything about
4	whether you had reserved space?
5	A. Not that I can remember.
6	Q. Okay. Did the police tell you
7	you had to leave?
8	A. To the best of my recollection,
9	yes, we were they were trying to pack their stuff
10	up and get us off the campus as soon as possible.
11	Q. Well, what did they say
12	specifically?
13	A. I don't remember the specifics.
14	Q. Did you have any personal
15	conversations with the police about the College
16	Republicans leaving the scene?
17	A. I remember the campus police
18	directing us on how to get to their police car so
19	they could drive us off campus.
20	Q. Okay. Had the tabling ended at
21	that point?
22	A. If I remember correctly, the
23	table was broken in half. So yes, we did not have a
24	table, working table.
25	Q. Okay. Did the College

	Page 228
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Republicans at any point pack up tables and materials
3	and leave the spine?
4	A. I believe Turning Point U.S.A.
5	had attempted to but they were stopped by College
6	Progressives, if I remember.
7	Q. And Turning Point U.S.A. would
8	have been who was the representative there?
9	A. Taylor Syinsky.
10	Q. Taylor, okay. So Taylor tried to
11	leave and was prevented by someone from leaving?
12	A. Correct.
13	Q. Okay.
14	A. If I remember correctly.
15	Q. And by Turning Point U.S.A.,
16	you're also referring to Jon and Lacey?
17	A. I believe it was just the Turning
18	Point U.S.A. table at that point.
19	Q. So the turning point U.S.A. guy
20	was trying to leave?
21	A. Yes.
22	Q. Okay. Okay. And what time did
23	the College Republicans meaning, who was present at
24	that point, it was you, Jon, Lacey and perhaps two
25	other people, you can't remember?

	Page 229
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Perhaps two other people. And I
3	know some other people, I believe I mentioned
4	earlier, Joe Bernstein or who transferred to
5	Cornell, I mentioned him previously
6	Q. Yeah.
7	A was one of our members was
8	there.
9	Q. He was present?
10	A. He was present, yes.
11	Q. Okay. Is he behind the table
. 12	when the protests began?
13	A. When I had arrived, he wasn't
14	there when I got there. That was the first time I
15	met him.
16	Q. Oh, okay. So you arrived from
17	class and he was there?
18	A. Yes.
19	Q. Okay. Got you. Did you have any
20	contact with anybody else other than during the
21	the tabling about the tabling that day?
22	A. Not that I can recall.
23	Q. Okay. Did you have any contact
24	with Raj about it?
25	A. Previously, I had contact letting

	Page 230
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	him know that we were setting up a table to pass up
3	materials.
4	Q. During the tabling event, did you
5	have any contact with him?
6	A. Not during the tabling event, no.
7	Q. Okay. I'm going to show you
8	what's been marked as Defendants' Exhibit Ten.
9	A. Okay.
10	Q. This is pages from Plaintiffs'
11	disclosures. And this is Bate stamped pages two zero
12	eight through two eighteen. Do you recognize what
13	these documents are?
14	A. They appear to be from the
15	college a lot of them the College Republicans
16	email
17	Q. Okay.
18	A to Raj.
19	Q. Okay. Were you the person
20	sending the emails? If you look at the first page.
21	A. Yes, I I
22	Q. There's a November 14th, 2019,
23	email at two ten p.m. It says, "Hi, Raj." And it
24	says, "From John Restuccia."
25	A. Uh-huh.

	Page 231
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. So when you're saying the College
3	Republicans email is does that mean you were the
4	one sending those emails?
5	A. Potentially, because I gave
6	access to the email to Preston Scagnelli to write
7	some emails on my behalf, if I remember correctly.
8	Q. Okay. Let's go a few pages in.
9	There are a number of emails here. And this is Bate
10	stamped pages two zero eight through two eighteen.
11	And they range from November 8, 2019 through November
12	14 2019, correct?
13	A. Uh-huh.
14	MR. CRAIG: Make sure you read the
15	document.
16	THE WITNESS: Okay.
17	MR. MOORE: Yeah.
18	THE WITNESS: Okay.
19	MR. CRAIG: And following along with
20	him.
21	THE WITNESS: Okay.
22	BY MR. MOORE: (Cont'g.)
23	Q. So do you do you agree with my
24	representation that these appear to be emails that
25	range in date from November 8th through the 14th,

	Page 232
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	2019. Is that correct?
3	A. Yes.
4	Q. And are these emails sent by you
5	to and received by you from Raj Kannappan?
6	A. So it appears that some of the
7	emails are my personal email, if you look in two
8	thirteen.
9	Q. Uh-huh.
10	A. My student email, my personal
11	student email, and then some are from the College
12	Republicans email.
13	Q. Okay.
14	A. It appears.
15	Q. Did you copy did you have some
16	setup or you automatically copied yourself to the
17	other email addresses in this chain?
18	A. Not that I can recall.
19	Q. Okay. Now, let's go to back
20	to page two ten and two eleven. At the bottom of two
21	eleven from College Republicans S.A., it says, "The
22	email, I also forwarded you, was the confirmation
23	that the room was extended." Did you send that
24	email?
25	A. It came from the Republicans at

	Page 233
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Binghamton@sa.org, I'm unsure if it was from me or
3	Preston because Preston had access to the email and -
4	-
5	Q. Look at the previous the
6	previous page.
7	A. Okay.
8	Q. And that is Bates stamp page two
9	twelve?
10	A. Uh-huh.
11	Q. That is an email, Friday,
12	November 8th, 2019, at four sixteen p.m., correct?
13	A. Correct.
14	Q. And that reads hi, Raj, here's
15	the map. All the purple areas are the parking lots,
16	which the building is right next to making the most
17	accessible area to students. The building is right
18	near the major living communities as well as detached
19	to the most populated classroom area.
20	The address is 600 Main Street,
21	Vestal, New York, to send the YAF package. From John
22	Restuccia. Did you send that email at four sixteen
23	p.m., on November 8, 2019?
24	A. It appears I did.
25	Q. You sign it, right?

	Page 234
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Correct.
3	Q. Or someone else signing your name
4	to emails that you're aware of?
5	A. Potentially Preston because I was
6	busy, I just needed him to approve things. So I
7	might have said to sign from John Restuccia, I don't
8	remember.
9	Q. Okay. And then that same minute.
10	There was an email it says, the email I also
11	forwarded to you was a confirmation that the room was
12	extended.
13	A. Uh-huh.
14	Q. Is it reasonable to assume that
15	John Restuccia sent that too?
16	A. Yes.
17	Q. Okay.
18	A. To the best of my recollection.
19	Q. Or someone pretending to be John
20	Restuccia?
21	A. Yes.
22	Q. Okay.
23	A. Could we take a break at all?
24	Q. Sure.
25	MR. CRAIG: Do you want to do lunch,

	Page 235
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	given that it's twelve zero seven. It depends
3	MR. MOORE: It's up to you guys. I
4	mean, we got to take
5	BY MR. MOORE: (Cont'g.)
6	Q. Okay. I got a few questions on
7	it.
8	A. Okay.
9	Q. Okay. Okay. So on Bates stamp
10	page two ten.
11	A. Uh-huh.
12	Q. There's a reply to your November
13	8th emails, correct?
14	A. Correct.
15	Q. It's a lengthy email from Raj,
16	dated November 12th, 2019 at nine zero five a.m.
17	A. Uh-huh.
18	Q. It starts, "Thanks for sending me
19	John these, John."
20	A. Uh-huh.
21	Q. Correct?
22	A. Correct.
23	Q. And it says, "Please also give me
24	an update later today about how your discussions with
25	professors are going regarding their offering extra

	Page 236
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	credits to students who'd attend your event, and also
3	regarding their allowing your club to speak about
4	your event in class.
5	"As we discussed, when asking your
6	professors, you will probably want to promote this
7	one as featuring leading academic and economist. Dr.
8	Arthur Laffer, who has developed the Laffer Curve,
9	and has advised numerous leaders on economic policy,
10	including Ronald Reagan and Donald Donald Trump."
11	And then he asked, "How is your flyer
12	going on campus?" And then he says, "Finally, Dr.
13	Laffer has a request for you regarding lunch," and
14	then it talks about changing the time for lunch.
15	A. Uh-huh.
16	Q. Did I read that correctly?
17	A. Correct.
18	Q. And I characterized the final
19	paragraph correctly?
20	A. Yes.
21	Q. Okay. Did you receive this
22	email?
23	A. It appears so.
24	Q. Okay. And did B.U. professors
25	offer extra credit related to the Laffer event

	Page 237
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	lecture?
3	A. I don't believe so, no.
4	Q. Did you ever ask?
5	A. I believe I might have asked some
6	professors, but
7	Q. But you don't remember as you sit
8	here today?
9	A. No.
10	Q. Okay. So you couldn't tell me
11	which professors you asked if you had asked any?
12	A. Correct. I can't I don't
13	remember.
14	Q. And we've already discussed the
15	lunch with Dr. Laffer, correct?
16	A. Correct.
17	Q. We already discussed the event
18	with George Phillips afterwards, correct?
19	A. Correct.
20	Q. And you just said you don't know
21	whether Dr. Laffer was paid separately for that lunch
22	and appearance with George, correct?
23	A. Correct.
24	Q. Okay. And then let's move to
25	Bates stamp page two zero eight, which is the first

	Page 238
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	page
3	A. Uh-huh.
4	Q of Exhibit Ten.
5	Q. And near the bottom, it says,
6	"John, please let me know the name and address of the
7	lunch restaurant. Additionally, please confirm that
8	you received our lecture box in the mail that
9	included a podium signed with following on it:
10	Thomas W. Smith Foundation free enterprise lecture
11	series. Thanks, Raj." That was sent in November
12	14th, 2019 at ten fifty-five a.m., correct?
13	A. Correct.
14	Q. And did you receive that email?
15	A. To the best of my knowledge, yes.
16	Q. Okay. And then there's an email,
17	November 14th, 2019 at two ten p.m., College
18	Republicans. This says, "Hi, Raj, currently, we just
19	ended tabling. We were getting protested by thirty
20	people from Progressives, but we handed out one fifty
21	fliers.
22	"I will have the information for the
23	reservation this afternoon. And we did receive the
24	podium sign from John Restuccia." Did you send that
25	email address? That email, I'm sorry.

	Page 239
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. It appears to be.
3	Q. Okay. And then he responds at
4	two eighteen, correct?
5	A. Correct.
6	Q. And it says, "Thanks, John, don't
7	worry about being protested against. That is usually
.8	a good sign that you're generating some interest."
9	Did did you receive that email?
10	A. Yes.
11	Q. And then there's an email in
12	responding. "Yes, we thought it was a very good
13	sign," exclamation point. That's written at two
14	twenty p.m. on November 14th, 2019?
15	A. Uh-huh.
16	Q. Did you write that?
17	A. To the best of my recollection,
18	it appears I did.
19	Q. Okay. And then there's one final
20	email on this thread at two forty p.m. And that
21	says, "Update, over a hundred people showed up and
22	stole some of our stuff and are protesting us." Did
23	you send that email?
24	A. Appears to have come from the
25	College Republicans email. I don't know if I

	Page 24
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restucció
2	specifically wrote it or not.
3	Q. Okay. So over a hundred people
4	showed up after Raj was told that you had ended up
5	and ended tabling and handed out a hundred and fifty
6	flyers, correct?
7	A. It appears so.
8	Q. Is does this refresh your
9	recollection that you handed out a hundred and fifty
10	flyers that day?
11	A. Potentially. Again, I don't know
12	how many exact flyers we we handed out.
13	Q. Okay. Would you have given Raj
14	inaccurate information?
15	A. I would have probably ballparked
16	it at the time.
17	Q. So I did ask you earlier about
18	how many flyers you handed out, right?
19	A. Right.
20	Q. And you said you weren't sure,
21	right?
22	A. Correct.
23	Q. Does this refresh your
24	recollection that the ballpark of the amount of
25	flowers you handed out was a hundred and fifty?

	Page 241
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Ballparking it, yeah.
3	Q. Yes?
4	A. Yes.
5	Q. Okay. Would that be unaccurate
6	(sic)?
7	A. I don't remember how many exact
8	flyers we handed out.
9	Q. Okay. But I'm just asking you to
10	confirm that if you wrote this on November 14th,
11	2019, would it have been true, or would you have
12	inflated that number?
13	A. Probably would have been true,
14	but I don't remember.
15	Q. All right. Do you know Brian
16	Rose by sight?
17	A. No.
18	Q. Okay. So do you know if he was
19	at the November 14th, 2019 tabling event?
20	A. No.
21	Q. Do you have any personal
22	knowledge whether he had any personal involvement in
23	directing the actions of B.U. police on November
24	14th, 2019?
25	A. I don't know.

Page 242

	1 dgc 2 42
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Do you know B.U.
3	president, Harvey Stenger, by sight?
4	A. Yes.
5	Q. Okay. Was he present at the
6	November 14th, 2019 tabling event?
7	A. I don't believe so.
8	Q. Okay. Do you have any personal
9	knowledge whether he had any personal involvement in
10	directing the actions of B.U. police on November
11	14th, 2019?
12	A. No, I don't know.
13	Q. Okay. And do you know John
14	Pelletier by sight? You said you
15	A. No.
16	Q. You don't?
17	A. I I don't know him by sight.
18	Q. Okay. Do you know if he was
19	present at the November 14th, tabling event?
20	A. I don't, no.
21	MR. MOORE: Okay. All right. Let's
22	stop there. If you want to take a break, then we'll
23	move on to the Laffer event, and we'll lead up to it.
24	Does that sound good?
25	MR. CRAIG: Yup.

	Page 243
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2 .	MR. MOORE: That worked for everybody?
3	All right.
4	(Off the record, 1:10)
5	MR. MOORE: Okay. We're back on the
6	record.
7	BY MR. MOORE:
8	Q. Mr. Restuccia, while we had a
9	or still off record, I'd handed you what's been
10	marked just now as Defendants' Exhibit Sixteen,
11	correct?
12	A. Correct.
13	Q. And does this refresh your
14	recollection that the this document which is Bates
1 5	stamped pages hold on, I've got it here. Bates
16	stamped pages one forty-four and one forty-five from
17	Plaintiffs' disclosures.
18	Does this refresh your recollection
19	that the group that had moved its events, the
20	location of its event on November 18th, 2019 to allow
21	for the Laffer event to be scheduled there was the
22	Finance Society?
23	A. Correct.
24	Q. Okay. And the Finance Society
25	was the group who sent a representative to the Laffer

Page 244

	rage 244
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	lunch as well?
3	A. Correct.
4	Q. Okay. That's all I have on that.
5	And just a little more housekeeping on the issue of
6	tabling.
7	A. Uh-huh.
8	Q. I'm going to show you a picture
9	which has been marked as Bates stamped page two zero
10	two from, again, Plaintiffs' disclosures. And it's a
11	colored photograph copy of a colored photograph.
12	A. Uh-huh.
13	MR. CRAIG: And it's been marked as
14	Exhibit Seventeen.
15	MR. MOORE: And it's been marked as
16	Exhibit Seventeen.
17	THE WITNESS: Uh-huh.
18	BY MR. MOORE: (Cont'g.)
19	Q. My question for you is, do you
20	do you I do you recognize what is depicted in that
21	photograph?
22	A. It appears to be, it looks like
23	Lacey Kestager, Taylor Syinsky, the representative
24	from Turning Point, U.S.A. tabling at T.P. U.S.A.'s
25	table, it looks like.

	Page 245
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. And was that if you
3	know, was there a little snow on the ground on the
4	date of the November 14th, 2019 tabling?
5	A. I believe so. I remember it
6	being cold, but that's typical for the area.
7	Q. Okay. So to the best of your
8	knowledge, was this photo taken on November 14th,
9	2019?
10	A. To the best of my knowledge, it
11	is.
12	Q. And does this photograph refresh
13	your recollection as to what the content of any of
14	T.P. U.S.A. signs were?
15	A. In looking at the signs, now I
16	know what they say, but
17	Q. Okay.
18	A I didn't remember at the time.
19	Q. Okay. And what what
20	are those signs?
21	A. There appears to be one that
22	says, I'm pro-choice, pick your gun.
23	Q. And there are
24	A. Uh-huh.

Q. There are photographs of -- or

25

	Page 246
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	rather drawings of guns on there as well? Pictures
3	of guns?
4	A. Yes, it appears to be a Glock
5	Twenty-seven, it says, an A.R. Fifteen and a twelve
6	gauge.
7	Q. Okay. Do you see any other signs
8	there that you can make out?
9	A. I think that's a rainbow A.R.
10	Fifteen, it looks like.
11	Q. Okay.
12	A. On the ground there.
13	Q. There's a there's a sign of
14	A.R. Fifteen rifle.
15	A. With rainbows.
16	Q. Sort of made into a rainbow?
17	A. Yes.
18	Q. Is that fair statement? Okay.
19	A. That's appears to be what it
20	is.
21.	Q. Okay. So Lacey is that's how
22	she was dressed on the day of the Laffer event? Or
23	rather the tabling event?
24	A. I believe so.
25	Q. Okay. And do you see on the

1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	right side of the photo, you could see the sort of
3	corner of another table?
4	A. Right there, yes.
5	Q. Yes. Is that the to the best
6	of your knowledge, the College Republicans table as
7	it appeared, or at least a small portion of it as it
8	appeared on November 14th, 2019?
9	A. It would be my best guess it was,
10	but I can't really see what's at the table or
11	anything
12	Q. Yeah. That's okay.
13	A around the corner.
14	Q. Were there any other tables set
15	up on the spine on November 14th, 2019?
16	A. Not that I can recall.
17	Q. Okay. So assuming that is the
18	College Republicans' table, can you make an
19	estimation based on that photograph of how far away
20	it was from the T.P. U.S.A. table?
21	Q. I'm not good with distances.
22	Q. Okay.
23	A. I don't. I generally don't know.
24	Q. Would you agree with me it'd be
25	less than ten feet?

Page 248

1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Again, I don't know how much a
3	foot is. So I'm not good with measurements.
4	Q. Okay. A foot is twelve inches.
5	A. Correct.
6	Q. I think we can all stipulate to
7	that.
8	A. Right, right.
9	Q. Yeah. So how many feet would you
10	guess that that is based on the appearance of the
11	human beings in the photo, and we could assume that
12	very few of them would be over six feet tall?
13	A. Looks like a couple of feet. But
14	again, I don't know how much in inches because I'm
15	bad with measurements. So I don't know how much an
16	inch is and
17	Q. Yeah, I wouldn't
18	A. If you put it in twelve into a
19	foot, but I don't know the exact.
20	Q. But less than ten feet is fair to
21	say based on the the depiction of the people in
22	that picture, correct?
23	A. Again, I don't know footage, but
24	it appears close.
25	Q. Okay. That's all I have on that

Associated Reporters Int'l., Inc.

800.323.7887	Associated Reporters Int I., Inc
	Page 249
1 B.U	. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	one.
3	A. Uh-huh.
4	Q. Thanks.
5	MR. MOORE: And again, I can make you
6	a copy of this one.
7	MR. CRAIG: I have the originals.
8	MR. MOORE: Okay. We'll put it with
9	the originals, sure. It's the only copy we have of
10	that one, so. And just send me a letter and I'll
11	MR. CRAIG: Yep.
12	BY MR. MOORE: (Cont'g.)
13	Q. Okay. Moving on.
14	A. Uh-huh.
15	Q. I am showing you what has been
16	marked as Defendants' Exhibit Twelve.
17	A. Sure.
18	Q. These are two pages. They are
19	from the Plaintiffs' disclosures in this case, and
20	they're Bate stamped pages two fifty-nine and two
21	sixty.
22	A. Okay.
23	Q. Do you recognize the Facebook
24	post on the first page?

25

A. I believe that's our official

Associated Reporters Int'l., Inc.

	Page 250
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	statement regarding the November 14th incident.
3	Q. Okay. And have you seen this
4	before today?
5	A. Yes.
6	Q. And who authored the statement?
7	A. Don't remember who specifically
8	authored it, but we did put out the statement, the
9	club put out the statement after the incident.
10	Q. Well, let me ask you this. Did
11	you have a hand in authoring this statement as the
12	president of the College Republicans?
13	A. I believe I did.
14	Q. Okay. Can you tell me who else
15	was involved in drafting that statement?
16	A. I don't know who else.
17	Q. Was it a group effort or was it
18	something you did on your own?
19	A. I believe it was a group effort.
20	Q. Did Young America's Foundation
21	have any hand in that?
22	A. I don't remember. I don't
23	believe so, but I don't remember exactly.
24	Q. Was anybody outside D.B.U.
25	College Republicans involved in the drafting of that

	Page 251
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	statement?
3	A. Not that I can remember.
4	Q. Okay. So it would have been you
5	and possibly other B.U. College Republicans who
6	drafted this?
7	A. To the best of my recollection,
8	yeah.
9	Q. And as president, would did
10	you have final approval on the content of this?
11	A. Yes.
12	Q. Okay. With respect to reserving
13	tables or reserving rooms on behalf of the College
14	Republicans, was that part of your duties as the
15	president of the College Republicans during fall
16	2019?
17	A. I believe initially. Can you
18	repeat the question?
19	MR. MOORE: Can you repeat the
20	question back to the witness?
21	THE REPORTER: Yes.
22	(Playback played)
23	BY MR. MOORE: (Cont'g.)
24	Q. Did you hear the question that
25	time?

	Page 252
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes, I did.
3	Q. Okay.
4	A. I don't remember if I
5	specifically did or if I delegated the task to
6	others.
7	Q. Okay. Well, we know that you are
8	the one who reserved the room rooms because there
9	are several reserved for the Laffer event, correct?
10	A. Yes.
11	Q. Okay. Was there anybody else in
12	the B.U. College Republicans who would have performed
13	that function during fall 2019 other than you?
14	A. Potentially some of the e-board
15	members.
16	Q. Okay. Do you have any specific
17	recollection of any e-board members getting involved
18	in reserving rooms or tables for the College
19	Republicans in fall 2019 during the time of your
20	administration?
21	A. I don't remember, but to the
22	my best guess, it would potentially be Preston
23	Scagnelli.
24	Q. Okay.
25	A. Because he also helped me with

Associated Reporters Int'l., Inc.

000.020	Tibboliulu Tepotioli Inti, in
	Page 253
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	the email.
3	Q. Did you give any directive to
4	Preston Scagnelli to reserve a table for the tabling
5	event?
6	A. I don't remember.
7	Q. Okay. Okay. Let's go back to
8	the complaint. And I am directing your attention to
9	paragraph seventy-seven, which is on page nineteen.
10	A. Page nineteen?
11	Q. Yes.
12	A. Okay.
13	Q. I'm going to start with this.
14	"On the day of the Dr. Laffer event, Monday, November
15	18th, 2019, Plaintiffs YAF and College Republicans
16	met with U.P.D. and certain SUNY Binghamton
17	administrators acting at the direction of Defendants,
18	Stenger Rosen and Pelletier." Did I read that
19	correctly?
20	A. Correct.
21 .	Q. In fact, were you present at this
22	meeting?
23	A. Yes, I believe so. If yes.
24	Q. Okay. Where did it occur?
0.5	

A. I don't remember where it

25

	Page 254
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	occurred exactly. Remember it was in the morning.
3	Q. Okay. Well, let's back up a
4	little bit.
5	A. Okay.
6	Q. And we'll go back to this. You
7	said you had met with Pelletier at some point after
8	the tabling event, but before the Laffer event?
9	A. Correct.
10	MR. CRAIG: Ob never mind.
11	BY MR. MOORE: (Cont'g.)
12	Q. The question is, where did that
13	meeting occur?
14	A. That meeting occurred at the
15	campus police station.
16	Q. And who was present at that
17	meeting?
18	A. Me, I believe, it was the chief
19	of police, campus security.
20	Q. So you, Pelletier?
21	A. Yes.
22	Q. Anyone else?
23.	A. Potentially John Lizak, and on
24	the phone was Raj as he was helping us coordinate the
25	event and the Young America's Foundation attorney, if

	Page 25
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	I remember correctly.
3	Q. Okay. And what was discussed at
4	the meeting?
5	A. We discussed, Raj has concerns
6	with how if there was a heckler's veto, some of
7	the security measures the university was going to
8	take to the Laffer event.
9	Q. Did he use the word heckler's
10	veto?
11	A. I don't remember specifically if
12	he did.
13	Q. Where did you come up with that
14	word?
15	A. I he might have used the term
16	heckler's veto. I believe that's a common term I've
17	heard in the past to describe people shouting down
18	events.
19	Q. Okay. Did he use that word
20	during the meeting with the chief of police?
21	A. I don't remember specifically.
22	Q. Okay. Well, discuss what you
23	specifically do remember about that conversation.
24	A. I specifically remember them
25	going over some

	Page 256
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Who is that who is them?
3	A. Campus police.
4	Q. Okay.
5	A. Going over some of this, what
6	would happen if there were happened to be someone who
7	disrupted the event or and how they would handle
8	it. And I remember walking out of the meeting and
9	talking to Raj and how he thought it went.
10	Q. Okay. But that wasn't the
11	meeting described in paragraph seventy-seven.
12	A. No, that was the meeting
13	that's a different meeting.
14	Q. Okay. So when did this this
15	meeting that you just described with Pelletier and
16	Raj on the phone, when did this occur?
17	A. After the tabling event, but
18	before the Laffer event.
19	Q. Okay.
20	A. I'm not sure on the specific
21	dates.
22	Q. Tabling event was the 14th,
23	Laffer event was the 18th of November of 2019. What
24	day did this meeting occur as it pertains to
25	A. I don't remember.

	Page 257
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. And one of the three days in
3	between those, 15, 16, 17?
4	A. To the best of my knowledge,
5	yeah.
6	Q. Okay. The 18th was a Monday,
7	correct?
8	A. Yes.
9	Q. Did this meeting occur over the
10	weekend or on a Friday?
11	A. I don't remember.
12	Q. Okay. Do you remember anything
13	else that was said?
14	A. No.
15	Q. Is there a recording of this
16	meeting?
17	A. Not that I'm aware of.
18	Q. Okay. Did you have any other
19	meetings with anyone else in the days on or between
20	the 14th of November of 2019 after the tabling event
21	occurred and the 18th of November 2019 when this
22	meeting described in paragraph seventy-seven
23	occurred?
24	A. Other than that meeting that's
25	described in paragraph seventy-seven, I can't

	Page 258
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	remember any.
3	Q. Okay. Did you have any contacts
4	via email or other via email with anybody to
5	prepare for the event, including members of the
6	College Republicans?
7	A. I don't remember if I did or not.
8	Q. Did you have any social did
9	you send any social media messages out regarding the
10	Laffer event in the days between the 14th and the
11	18th of November 2019?
12	A. Not that I remember, but I don't
13	remember any.
14	Q. You did the social media post
15	about the tabling event, correct?
16	A. Correct.
17	Q. And you were involved in writing
18	that and posting it, correct?
19	A. Correct.
20	Q. Were there any other
21	communications put forth regarding either the tabling
22	or Laffer event?
23	A. I don't remember any.
24	Q. Okay. And you don't recall any
25	other meetings other than the one you just described?

Associated Reporters Int'l., Inc.

Page 259 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 Α. Correct. 3 Q. Okay. Let's go back to the 4 meeting of November 18th, 2019, which is described in 5 paragraph seventy-seven of the complaint. 6 Α. Uh-huh. 7 Where did this meeting occur, if 0. 8 you remember. You said you --9 I don't remember the exact Α. 10 location of it. 11 Was it at the lecture hall? 12 It was not at the lecture hall, Α. 13 no. I -- might have been at one of the 14 administration buildings, but I don't remember. 15 Q. Okay. Okay. Who is there -- who 16 else was present? So it says, "Plaintiffs YAF and 17 College Republicans." Who was there from College 18 Republicans? 19 Α. I was there from College 20 Republicans.

- John Lizak, but I don't remember.
- Q. Okay. How about YAF who was

Q.

Anyone else?

I don't remember, potentially

25 there -- was Lacey there?

21

22

Page	2	6	0
------	---	---	---

	Page 260
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Lacey, I don't believe, was
3	there.
4	Q. Okay. And how about anybody else
5	from your executive board?
6	A. Not that I can remember.
7	Q. Okay. Who is there from the YAF?
8	A. If I remember correctly, Raj was
9	on the phone. If I yes, Raj was on the phone at
10	the time. So I called Raj to put to put him on
11	speakerphone, so he could hear what was being said
12	and talked about.
13	Q. So he wasn't at the meeting, he
14	was just listening and
15	A. Yes.
16	Q. Okay.
17	A. On speaker.
18	Q. Who is there from U.P.D.?
19	A. I don't remember who was there
20	from U.P.D.
21	Q. Okay. You don't know if John
22	Pelletier was there?
23	A. I do not know.
24	Q. There is how many do you know
25	how many people were there from U.P.D.?

		Page 2	261
1	B.U. College, et al v	Rose, et al - 1/10/23 - J. Restuce	cia
2	Α.	I don't.	
3	Q.	Were they uniformed officers or	
4	plain cloth pl	in clothes officers?	
5	Α.	I don't remember who was at	
6	Q.	Okay.	
7	Α.	the meeting other than me.	
8	Q.	It also says, "Certain SUNY	
9	Binghamton admini	trators." Do you know which SUNY	
10	Binghamton admini	trators were present?	
11	Α.	I do not remember the specific	
12	administrator.		
13	Q.	Was it one person? Because this	S
14	says administrato	'S.	
15	Α.	I believe there was another, but	t
16	I don't know spec	fically who it was.	
17	Q.	So it's between one to two	
18	people?		
19	Α.	Yes.	
20	Q.	Were they male or female?	
21	Α.	Male.	
22	Q.	Are they older, younger? Any	
23	description you c	n give these individuals? Black,	
24	white		
25	Α.	Caucasian.	

	Page 262
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Tall, short?
3	A. I can say Caucasian
4	Q. Yep.
5	A. And that's the best of my memory.
6	Q. Okay. How do you know they were
7	acting at the direction of Defendants Stenger, Rose
8 .	and Pelletier? Who do you let me ask it this way.
9	I'm sorry. I'll rephrase, strike that question.
10	Who do you contend was acting at the
11	direction of Defendants Stenger, Rose and Pelletier?
12	MR. CRAIG: Objection. I don't think
13	he's made that contention.
14	MR. MOORE: Okay.
15	BY MR. MOORE: (Cont'g.)
16	Q. This would you agree with me
17	that this paragraph says, "On the day of the Dr.
18	Laffer event, Plaintiffs YAF and College Republicans
19	met with U.P.D. and certain SUNY Binghamton
20	administrators acting at the direction of Defender
21	Defendants, Stenger, Rose and Pelletier." You see
22	that?
23	A. Uh-huh, yes.
24	Q. Do you know who, if anybody, at
25	this meeting was acting at the direction of Stenger,

Associated Reporters Int'l., Inc.

Page 263 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 Rose and Pelletier? If you know. 3 Α. I do not know. 4 Okay. And do you -- can I assume 5 then they -- strike that. 6 Do you have any personal knowledge of 7 what direction Defendant Rose gave to those present 8 at the November 18, 2019 meeting referenced in 9 paragraph seventy-seven? 10 Α. I'm not Brian Rose, I can't 11 answer that. 12 Okay. Do you have -- well, I Q. mean, you weren't present for him giving any 13 14 direction to anybody, correct? MR. CRAIG: He's -- if I may? He's 15 16 asking do you -- do you know of any direction given 17 to them? Do you know, not was direction given? He's 18 asking what -- what do you know? 19 THE WITNESS: I do -- best of my 20 recollection is that the -- from what I was relayed 21 was that, people -- the administration and the people 22 in -- who I was discussing it with wanted to change 23 the room. 24 Q. Okay. Got you. But my question 25 was, do you know if that was done at the direction of

Associated Reporters Int'l., Inc.

Page 264 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 Defendant Rose? 3 I don't know who specifically was Α. done at the direction of. 4 5 0. And do you have any personal 6 knowledge of whether this was done at the direction 7 of Harvey Stenger? 8 A. I do not know. 9 Q. Okay. And do you have any 10 personal knowledge whether this was done at the direction of John Pelletier? 11 12 I do not know. Α. 13 Q. Okay. What did they say about 14 moving the room? 15 They said there was some security 16 concerns they had and that they wanted to change the 17 room to a bigger lecture hall. 18 Q. Okay. Let's go to paragraph 19 seventy-eight and seventy-nine. 20 Α. Uh-huh. 21 And we'll go through this. 0. says, paragraph seventy-eight of Exhibit One. "At 22 23 this meeting, U.P.D. told YAF and College Republicans 24 that through social media monitoring, U.P.D. was

aware of threats to disrupt the event by student and

25

	Page 265
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	non-student groups, including College Progressives
3	and PLOTs posting the PLOTs flyer."
4	Paragraph seventy-nine. "U.P.D. also
5	blamed YAF and Co College Republicans for opening
6	their event to such disruption by hosting it public
7	as opposed to private ticketed event." Did I read
8	that correctly?
9	A. Yes.
10	Q. Were these things said, that you
11	remember?
12	A. Again, I remember being told that
13	they wanted to do the security concerns, they wanted
14	to change the location of the event.
15	Q. Okay. You don't remember
16	anything being said about having a public as opposed
17	to ticketed event?
18	A. Not that I can recall. I don't
19	remember.
20	Q. Okay. And you don't remember
21	anything being said about threats to disrupt the
22	event by student and non-student groups or reference
23	to a flyer?
24	A. I remember seeing a flyer, but I
25	don't remember when.

	Page 266
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2 .	Q. Okay. So you don't know if they
3	address that at this meeting?
4	A. I don't remember.
5	Q. Okay. Let's go on to paragraphs
6	eighty and eighty-one of Exhibit One.
7	A. Uh-huh.
8	Q. And these read, "At this meeting,
9	the SUNY Binghamton administrators told YAF and
10	College Republicans that they were unilaterally
11	imposing two conditions on the planned event."
12	Paragraph eighty-one. "First, SUNY
13	Binghamton had decided to increase the U.P.D. police
14	presence and move the event to a lecture hall with
15	more readily available egress routes that would allow
16	U.P.D. to remove Dr. Laffer more readily if they
17	chose to do so."
18	Did I read that correctly?
19	A. Correct.
20	Q. Did they say specifically this
21	that you remember?
22	A. They specifically said that I
23	remember specifically being told that all the off-
24	duty U.P.D. officers were going to be at the event
25	and that it was an all-hands on deck.

	Page 267
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. All-hands on deck meaning,
3	most of the police force will be there?
4	A. Yes.
5	Q. Okay. Did you think of that as a
6	good thing or a bad thing?
7	A. I thought of it as neutral.
8	Q. Okay.
9	A. I didn't really think positive or
10	negative of it.
11	Q. Okay. And do you remember
12	anything else being said other than we're going to
13	change the room?
14	A. I remember being told that
15	College Progressives were going to get the room
16	adjacent to us.
17	Q. Okay. And we'll get to that.
18	A. Okay.
19	Q. Yeah. Any nothing else you
20	remember being said?
21	A. Not that I can remember.
22	Q. Nothing about removing Dr.
23	Laffer?
24	A. Not that I can remember.
25	Q. Okay. Let's go on to the second

Associated Reporters Int'l., Inc.

Page 268 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 thing, this complaint claims was said. And this is 3 paragraph eighty-two of Exhibit One. "Second, SUNY 4 Binghamton had decided to facilitate defending 5 College Progressive's effort to disrupt the event by 6 providing them with a lecture hall adjacent to the 7 Dr. Laffer event, which had connecting doors to the 8 events lecture hall to organize the planned 9 disruption of Plaintiffs' event. 10 Did I read that correctly? 11 Α. Correct. 12 0. And what was said? 13 What was said was that College Α. 14 Progressives were given the lecture hall adjacent to 15 our lecture hall, I believe, an hour before our event 16 started. 17 Q. Okay. And do you have any 18 personal knowledge of who made that decision? 19 Α. I do not. 20 0. And do have any personal 21 knowledge of why the protesters were given another 22 lecture hall to protest? 23 If I remember correctly, I was Α. 24 told it was supposed to relieve some of the pressure 25

from, if they were going to come over to our event.

Associated Reporters Int'l., Inc.

Page 269 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 Q. Okay. And do you believe that 3 the persons who disagreed with Dr. Laffer's view, if 4 at all, had a First Amendment right to express that 5 opinion? 6 The -- in a safe way, yes. Α. 7 Q. And do you believe they had a 8 right in your opinion to utilize the adjacent lecture 9 hall to express their views? 10 Yes, I would say they had a right Α. 11 to, but I didn't feel it was fair to give them a lecture hall last minute after working very hard to -12 13 - work to get our lecture hall. 14 Q. Okay. You thought it was too 15 easy for them to get the lecture hall? 16 Α. I thought they had it booked it 17 in advance. And after the hoops we had to jump 18 through to book our lecture hall, I didn't find it 19 fair. 20 Ο. Okay. Let's move on to paragraph 21 eighty-nine of the complaint. 22 Α. Okay. 23 And this says, "A few hours 0. 24 before the Dr. Laffer event, Dr. Laffer and his aides 25 arrived at a nearby airport." And then paragraphs

	Page 270
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	eighty-nine through ninety-three talk about a meeting
3	that occurred at the airport.
4	A. Uh-huh.
5	Q. Were you present for the airport
6	meeting described at paragraphs eighty-nine through
7	ninety-three of the complaint?
8	A. I was not.
9	Q. Okay.
10	THE WITNESS: Can I use? Can I have a
11	restroom break
12	MR. MOORE: Sure.
13	THE WITNESS: quickly? Thank you.
14	(Off the record; 1:37)
15	BY MR. MOORE: (Cont'g.)
16	Q. Move down to paragraph ninety-
17	four of the complaint.
18	A. Uh-huh.
19	Q. References another meeting. This
20	is page twenty-one of Exhibit One and paragraph
21	ninety-four reads, "Approximately one hour before the
22	Dr. Laffer event, the two Pinkerton agents hired by
23	YAF met with U.P.D." Were you at this meeting?
24	A. I believe I was.
25	Q. Okay. Who are the two Pinkerton

	Page 271
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	agents hired by YAF?
3	A. I don't know. All I was told was
4	they were security for Dr. Laffer.
5	Q. Okay. And paragraph ninety-five
6	says, "At this meeting, U.P.D. stated they were aware
7	of College Progressives and PLOTs planned disruption
8	of the Dr. Laffer event." Were you there for that?
9	A. I believe so.
10	Q. What was said?
11	A. I don't remember specifically.
12	Q. Was it essentially what's in
13	paragraph ninety-five?
14	A. Yes.
15	Q. And then paragraph ninety-six
16	reads, "Pelletier told the Pinkerton agents that if
17	disruptors approached Dr. Laffer's podium, then you
18	would order the Pinkerton agents to escort Dr. Laffer
19	out of the event. Plaintiffs were not made aware of,
20	nor did they consent to this plan of violation of
21	their constitutional rights."
22	What was said?
23	A. I don't remember.
24	Q. Do you remember this being said?
25	A. I don't remember it.

	Page 272
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Did the did the pro
3	disruptors ever approach or rush Dr. Laffer's podium?
4	A. That night?
5	Q. Yes.
6	A. To the best of my recollection,
7	yes.
8	Q. They they were they
9	approached his podium?
10	A. Yes.
11	Q. Describe what happened? What
12	protesters did what towards Dr. Laffer.
13	A. So if I remember correctly, going
14	back to the event, there was a man with a megaphone.
15	Q. Uh-huh.
16	A. Who stood up on one of the
17	tables.
18	Q. Yes.
19	A. Students surrounded him. He was
20	in the front row, I believe, or second to front row.
21	And students started surrounding him and getting
22	closer and closer to the podium.
23	Q. They moved from where the
24	megaphone guy was?
25	A. So more students start to

Associated Reporters Int'l., Inc.

Page 273 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 surround him, if I remember. 3 Okay. And that group moved Q. towards Dr. Laffer, or were they trying to surround 4 5 the speaker? 6 I re -- if I remember correctly, Α. 7 they were trying to surround the speaker, but they 8 were running in front of the podium to -- in order to 9 surround the speaker. 10 0. Okay. We'll watch some video. 11 Then we'll see. Paragraph ninety-seven reads as follows. "U.P.D. was so convinced of inevitable 12 disruption that it also informed YAF donor and Dr. 13 14 Laffer's driver for the day, Jeffrey Coghlen that he 15 should stay with the vehicle since Dr. Laffer may 16 need to make a quick getaway if the event was 17 effectively canceled by the disruptors." Did I read that correctly? 18 19 Α. Correct. 20 0. Were you present for this 21 meeting? 22 Α. No. 23 Okay. Next page. This is para -0. 24 - page twenty-two of Exhibit One, paragraph ninety-25 eight reads as follows. "At least one hour before

	Page 274
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	the Dr. Laffer event was scheduled to begin, College
3	Progressives and PLOT and their co-conspirators were
4	lined up outside the lecture hall and packed into the
5	adjacent lecture hall provided to College
6	Progressives by SUNY Binghamton administrators."
7	Paragraph ninety-nine. "Once the door
8	to the Dr. Laffer event was opened, hundreds of
9	students and non-students, mamy many of the
10	members of College Progressives and PLOT flooded into
11	and packed the room." Did I read that correctly?
12	A. Correct.
13	Q. Okay. Were you present when this
14	all occurred?
15	A. Yes, if I remember
16	Q. You were there for an hour before
17	the Dr. Laffer took the stage?
18	A. Correct, I
19	Q. To the podium?
20	A. If I remember correctly, yes.
21	Q. Were you in the room in the
22	lecture hall?
23	A. Yes, if I remember correctly.
24	Q. Did you have any contact with Dr.
25	Laffer other than lunch before the

	Page 275
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Just the lunch
3	Q. Before the speech?
4	A. Yeah, if I remember correctly,
5	just the lunch.
6	Q. Okay. At the at the lunch,
7	did you discuss with Dr. Laffer any plan to leave the
8	speech if there were protesters?
9	A. I don't believe I did.
10	Q. Do you did this well, you
11	don't you might have talked about it with him?
12	A. I don't think I did, no.
13	Q. Okay.
14	A. I don't think I did.
15	Q. Okay. Did you have any
16	conversations with Dr. Laffer about the possible
17	appearance of protesters at the speech?
18	A. Not that I can recall.
19	Q. He didn't bring it up?
20	A. Not that I can recall.
21	Q. You didn't bring it up?
22	A. Not that I can recall.
23	Q. Did anybody else bring it up?
24	A. Not that I can recall.
25	Q. Okay. Was there recording made

	Page 276
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	at the lunch with Dr. Laffer?
3	A. I no, I don't believe so.
4	Q. Now, in paragraph ninety-nine, it
5	says, "Many of the members of College Progressives
6	and PLOT."
7	A. Uh-huh.
8	Q. How do you do you know
9	personally whether any of these individuals were
10	members of College Progressives and/or PLOT?
11	A. They were wearing T-shirt
12	hoodies that said PLOT on them, and they were wearing
13	masks at the time. So I would say just my
14	observation that they were members of PLOT.
15	Q. Okay. And did you recognize any
16	of these members of PLOT personally?
17	A. I recognize, if I remember
18	correctly, I mentioned earlier a College Progressive
19	member who potentially could be in PLOT, Dava.
20	Q. Okay. You recognize her it's
21	a she, right?
22	A. Yes.
23	Q. And was there anybody else in
24	that group of alleged PLOT and/or College Progressive
25	individuals that you recognize personally?

•	Page 277
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. A a lot of them were wearing
3	masks, so I couldn't tell.
4	Q. Okay. So you only recognize one
5	person as being a College Progressives member?
6	A. As far as I remember.
7	Q. And you recognize people you
8	didn't know who were apparently wearing the insignia
9	of PLOT on their clothing?
10	A. Wearing the insignia and wearing
11	masks, yes.
12	Q. Okay. And are you aware of the
13	identity of anybody else at the Laffer event from the
14	College Progressives?
15	A. Not that I'm aware of.
16	Q. Who was present at the Laffer
17	event from College Republicans?
18	A. It was John Lizak, Preston
19	Scagnelli, Kyle Nelson, Lacey Kestager, me. I
20	mentioned Joe earlier, Joe Bernstein Bernstein
21	or I mentioned him earlier that I met at the tabling
22	event.
23	Q. Yep.
24	A. Those were the main members I
25	remember at the Laffer event.

		Page 278
1	B.U. College, et al v Rose, et al	- 1/10/23 - J. Restuccia
2 .	Q. Okay. So	six people from College
3	Republicans?	
4	A. More than	that. I just don't
5	remember the rest.	
6	Q. Okay. So	you said you had
7	approximately fourteen people	in the group at the
8	time?	
9	A. Yeah.	
10	Q. Were they	all present?
11	A. Maybe ten	were present.
12	Q. And you ju	st don't know?
13	A. Approximat	ely, but
14	Q. You don't	know the other four?
15	A. I don't re	member.
16	Q. Okay. Was	there anyone else
17	present at the Laffer event th	at you knew personally,
18	who you haven't told me about	yet today?
19	A. Bobby Walk	er was at the Laffer
20	event.	
21	Q. You alread	y mentioned him though,
22	right?	
23	A. Correct.	
24	Q. Anybody el	se?
25	A. Not that I	can recall.

	Page 279
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Was anybody else present
3	at the Laffer event who you do not know personally,
4	but whose identity you know?
5	A. No.
6	Q. All right. Paragraph one zero
7	four appears on page twenty-three of Exhibit One.
8	And it says, "At the insistence of College
9	Republicans and YAF, U.P.D. made one statement about
10	the size of the crowd at SUNY Binghamton's fire code
11	and ask those standing to take their seats." Did you
12	hear this occur?
13	A. If I remember correctly, yes, I
14	believe I did.
15	Q. Okay. Was anything else said in
16	the announcement?
17	A. Uh-huh. Just that they had to
18	clear the aisles, so that there wouldn't be a fire
19	code violation.
20	Q. Okay. And do you know who said
21	that?
22	A. I don't remember specifically.
23	To the best of my recollection, it was U.P.D. made
24	a statement and someone from the administration made
25	a statement, if I remember.

	Page 280
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. So the two statements?
3	A. Yes.
4	Q. Okay. What was said in the
5	U.P.D. statement?
6	A. If I remember, I was just asking
7	to clear the aisles.
8	Q. Okay. And something about the
9	fire code?
10	A. Yes.
11	Q. And what then you said
12	administrator also made a statement?
13	A. If I remember correctly, Raj had
14	I was with Raj, and Raj had asked him to make a
15	statement in order to kind of quell the crowd.
16	Q. Okay. And can you remember the -
17	- the content of that statement?
18	A. If I remember, it was just about
19	the fire code again.
20	Q. Okay. Nothing other than or
21	fire possible fire code violation?
22	A. If I remember, the administrator
23	was hesitant to give a statement because he didn't
24	think they would listen to him.
25	Q. Okay. Do you know who the

600.525.	Associated Reporters IIII 1., III
	Page 281
1	B.Ü. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	identity of that person is?
3	A. I don't remember, no.
4	Q. Okay. But he made some sort of
5	statement?
6	A. Correct, if I remember.
7	Q. Okay. Paragraph one zero seven,
8	on the same page reads as follows. "Due to the size
9	of the crowd, several invited guests of Plaintiffs
10	and other interested students were unable to exit
11	enter the lecture hall and attend the event."
12	Did I read that correctly?
13	A. Correct.
14	Q. What does this refer to?
15	A. If I remember, we invited the
16	Cornell College Republicans as they let us attend one
17	of their events. So in turn, we invited that group
18	to come out and watch Dr. Laffer.
19	Q. Do you know if they showed up?
20	A. If I remember correctly, they
21	showed up outside, but they couldn't get inside.
22	Q. Were you told that or did you see
23	it?
24	A. I was told that.
25	Q. Who told you that?

Associated Reporters Int'l., Inc.

Page 282 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 Α. The, I believe, then president of 3 the Cornell College Republicans. 4 Okay. Are you aware of any other Q. 5 individuals who are invited quests of Plaintiffs or other interested students who couldn't get in? 6 7 Not that I remember. Α. 8 0. Okay. Paragraphs one zero eight 9 and one zero nine, I shall read into the record from 10 that same page, page twenty-three --11 Α. Uh-huh. 12 -- as Exhibit One. Paragraph one O . . 13 zero eight. "The Dr. Laffer event started promptly 14 at seven thirty p.m. E.S.T. with John Restuccia, the 15 then President of College Republicans, providing a brief two-minute introduction of Dr. Laffer." 16 17 One zero nine. "During his 18 introduction, Restuccia ask those in attendance who disagreed with Dr. Laffer's remarks to save their 19 20 questions for their question-and-answer portion. He 21 noted that such individuals will be more than welcome 22 to voice any disagreements at that time." 23 Did I read that correctly? 24 Α. Correct. 25 Q. And is that in sum and substance

Associated Reporters Int'l., Inc.

Page 283 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 1 2 what you said or did you say anything else? 3 Α. I just gave a brief introduction 4 of who Dr. Laffer was talking about some of his 5 achievements as well as his bipartisan achievements. 6 And I did mention that anyone who had disagreements 7 with him could ask questions and grill him essentially on some of his policies. 8 9 During the question-and-answers? 0. 10 The question-and-answer portion. 11 Q. Okay. Did you discuss the 12 contents of your intro with YAF before you made your 13 intro? 14 Α. I don't remember. I believe I 15 sent a copy over to YAF. 16 Okay. Do you have that email, Q. 17 and do you have a copy of your statement? 18 Α. I don't -- I don't know what 19 email I would have sent it through because it might 20 have been my university email. 21 Okay. But you send an email 0. 22 version of it to YAF prior to the event. Is that 23 correct? 24 To the best of my recollection, I Α. 25 did.

Associated Reporters Int'l., Inc.

Page 284 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 Okay. And I'm going to make a Q. 3 request for that copy of that. You're searching your 4 emails anyway for any relevant emails, so that would 5 be included. 6 And same question with Dr. Laffer. 7 Did you discuss with him the content of your intro before you read -- before you read your intro? 8 9 Α. Not that I recall. 10 0. Okay. Did you have any other conversations with Dr. Laffer outside the lunch? 11 12 Α. That day? 13 0. Yeah. 14 Α. No. 15 Q. Okay. 16 Not that I can recall. Α. 17 Q. Got you. Let's go to the bottom 18 of this page and read the next few paragraphs. I'll 19 read paragraphs one ten through one thirteen. One 20 Dr. Laffer took the podium and just a few 21 seconds in, a member of defending College 22 Progressives and/or Defendant PLOT stood up in the 23 second row and began shou -- shouting accusations of

Dr. Laffer and yelling, we are tired of being

oppressed, we are tired of getting murdered by this

24

25

	Page 285
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Trump administration, that you, this man, the slider
3	author Laffer supports."
4	One eleven. "The disruptor then
5	accused Dr. Laffer of helping the Trump
6	administration further racial oppression in a justice
7	system that he equated with modern day slavery."
8	One twelve. "The majority of those
9	present greeted these accusations with a flawless and
10	the disrupting student was soon handed a megaphone
11	and urged to continue."
12	One thirteen. "Although Dr
13	although Pelletier and U.P.D. had stationed several
14	officers in the room pursuant to the speech
15	suppression policy, they took no action to prevent
16	the student from disrupting the event."
17	Did I read that correctly?
18	A. Correct.
19	Q. What is the speech suppression
20	policy? Have you ever read that?
21	A. I have not, no.
22	Q. Do you know what that is?
23	A. No.
24	Q. Okay. How do you know this
25	individual with who eventually got the megaphone

	Page 286
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	was a member of College Progressives and/or PLOT?
3	A. I don't know who he was.
4	Q. Okay.
5	MR. CRAIG: Objection. Has he
6	testified that he knew they were a member?
7	MR. MOORE: I'm just okay. Let me
8	ask this way. It's a valid objection.
9	BY MR. MOORE: (Cont'g.)
10	Q. Do you know whether this
11	individual was a member of College Progressives?
12	A. I do not know.
13	Q. Do you know whether this
14	individual was a member of PLOT?
15	A. I don't know specifically, but
16	the talking points he was shouting were very similar
17	to PLOT's talking points that I've heard.
18	Q. Was he wearing the insignia of
19	PLOT?
20	A. I don't remember.
21	Q. Okay. And was this individual
22	arrested by the U.P.D., if you know?
23	A. I do not know.
24	Q. Okay. He may have been, he may
25	not have been. You just don't know as you sit here

Associated Reporters Int'l., Inc.

Page 287 1 B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia 2 today, correct? 3 I do not know. Α. 4 Okay. Was he or she a student? Q. 5 I do not know. Α. 6 Q. Was it a he or was it a she? 7 If I remember correctly, it was a Α. 8 man. 9 Q. Okay. And you don't know whether 10 this was a student? 11 I do not know. Α. 12 Okay. If that individual was Q. 13 arrested, would you agree with me that it is 14 inaccurate that they took no action to prevent the 15 student from disrupting the event? 16 Α. Can you repeat the question? 17 If that individual was arrested 0. 18 by U.P.D., would you agree with me that it is 19 inaccurate that U.P.D. took no action to prevent the 20 student from disrupting the event? 21 Well, they didn't stop him 22 initially. They let him speak for a little while, if I remember correctly, so. And I don't know what 23 24 happened after that, but they let him speak for quite

a while.

25

	Page 288
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Were were officers
3	moving towards him when he stood up?
4	A. They began to move towards him as
5	he stood up, and then people surrounded him. And if
6	I remember, the officer's kind of backed off when a
7	crowd of people surrounded him.
8	Q. Okay. The officers never tried
9	to make their way through the crowd of people?
10	A. I don't remember.
11	Q. They might have, they might not
12	have, you just don't remember as you sit here today?
13	A. I do not remember.
14	Q. The video would show that,
15	wouldn't it?
16	A. If there's a video, yeah.
17	Q. Okay. Paragraph one fourteen.
18	"College Republicans, who are sitting in the first
19	row stood up and displayed free speech signs in
20	response to the disruptors." Did I read that
21	correctly?
22	A. Correct.
23	Q. Were the can you describe the
24	signs that were is that accurate? Were free
25	speech signs displayed?

	Page 289
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes, we each had a little sign in
3	our hands that I believe said free speech or
4	something to that effect. And we kind of tried to
5	make a wall to kind of our to protect Laffer
6	almost
7	Q. Okay.
8	A in the front of the stage.
9	Q. Did anyone breach that wall?
10	A. I don't remember.
11	Q. You don't remember?
12	A. I do not remember, no.
13	Q. Okay. Who provided you with
14	these free speech signs before the Laffer event?
15	A. I believe it was Young America's
16	Foundation.
17	Q. When did they provide these signs
18	to you?
19	A. I don't remember.
20	Q. Was it that day?
21	A. I don't remember.
22	Q. Had you had any discussions with
23	Young America's Foundation about the fact that you
24	would be wielding free speech signs at the event?
25	A. I don't remember.

	Page 290
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. You don't remember?
3	A. I do not remember.
4	Q. Okay. Did it strike you as odd
5	that you were handed signs by YAF before the event?
6	A. Again, I don't remember when they
7	handed us those signs.
8	Q. Well, was it before the event or
9	during the time after the protesters began?
10	A. I don't remember.
11	Q. Okay. Well, did they come up to
12	you while the protesters had begun their this
13	individual had begun his speech and hand you the
14	the free speech signs, or did you have those in your
15	hands when he began his his diagram?
16	A. I don't remember.
17	Q. You don't remember?
18	A. I don't remember.
19	Q. Okay. Well, I'll tell you right
20	now, we'll watch the video.
21	A. Okay.
22	Q. And I don't see anybody come up
23	and hand you any signs.
24	A. Okay.
25	Q. So when did you get the signs?

	Page 291
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't remember.
3	Q. Okay. YAF gave them to you
4	though, correct?
5	A. They had YAF's logo, I remember
6	on them.
7	Q. Okay. And was there any
8	discussion of a plan of what to do with these signs
9	when they were provided?
10	A. Not that I can remember. I don't
11	remember.
12	Q. Okay. And you didn't give any
13	instructions to anybody in the group of College
14	Republican students who had the signs?
15	A. I don't remember.
16	Q. Did everybody just get up
17	spontaneously and stand in front of Laffer?
18	A. I don't remember.
19	Q. Okay. And you don't remember any
20	discussion about preparation of these of use of
21	these signs prior to the event beginning?
22	A. I don't remember, no.
23	Q. So might have happened, or might
24	not have remem that strike that. It might have
25	happened. It might not have happened. You just

	Page 292
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	don't remember as you sit here today?
3	A. I do not remember as I sit here
4	today.
5	Q. Okay. So it doesn't discount
6	that there could be a conversation, or there might
7	have been no conversation. It's just you don't
8	remember?
9	A. I just don't remember.
10	Q. Okay. Were there any emails or
11	texts that discussed the utilization of free speech
12	signs at the event prior to the event? In other
13	words, did anyone text about this plan prior to the
14	event occurring?
15	A. I don't remember.
16	Q. Did anyone send emails regarding
17	the plan to utilize free speech signs prior to the
18	event?
19	A. I don't remember.
20	Q. Okay.
21	A. I do not remember.
22	Q. Was Defendant Harvey Stenger
23	present at the Laffer event?
24	A. I do not believe he was.
25	Q. Was Defendant Pelletier event

	Page 293
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	present?
3	A. I don't remember.
4	Q. Did you have any conversations
5	with any of those three individuals at the event?
6	A. Not that I remember.
7	Q. Did you hear anything those
8	indivi three individuals said during the event?
9	A. Not that I remember.
10	MR. CRAIG: John, would it be helpful
11	to ask whether he'd recognize any of those
12	individuals?
13	MR. MOORE: I think I asked that
14	already.
15	MR. CRAIG: Okay.
16	MR. MOORE: Yeah.
17	BY MR. MOORE: (Cont'g.)
18	Q. Did anyone from the U.P.D. or
19	anyone else prevent you or any other member of
20	College Republicans from displaying your free speech
21	signs?
22	A. I don't remember. Not that I can
23	recall.
24	Q. Okay. How long did you display
25	your sign for personally?

	Page 294
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't remember how long.
3	Q. Okay. Did Defendant Pelletier
4	prevent you from displaying a free speech sign during
5	the event?
6	A. Not that I remember.
7	Q. Okay. Did anyone else from B.U.
8	prevent College Republicans from displaying free
9	speech signs?
10	A. Not that I remember.
11	Q. Did anyone else prevent you in
12	any way from displaying free speech signs?
13	A. Not that I remember.
14	Q. Okay. Paragraph one fifteen.
15	A. Uh-huh.
16	Q. I'll read one fifteen and one
17	sixteen. This is page twenty-four of Exhibit One.
18	Paragraph one fifteen. "The member of College
19	Progressives and/or PLOT spoke through the megaphone
20	for nearly two minutes before U.P.D. took any action
21	to restrain him."
22	One sixteen. "Ten to fifteen members
23	of College Progressives and PLOT then formed a
24	progressive barrier around the megaphone wielding
25	disrupter." Did I read that correctly?

	Page 295
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Correct.
3	Q. Okay. Do you know how quickly
4	the police officers began moving towards the
5	megaphone wielding disrupter after he began talking?
6	A. I don't remember specifically,
7	but they let him speak for a while.
8	Q. Okay. Do you know if they were
9	moving towards him during his speech?
10	A. I don't remember.
11	Q. Okay. So they might have been,
12	they might not have been. You just don't know as you
13	sit here today?
14	A. Correct.
15	Q. Okay. And do you know any of the
16	ten to fifteen members of College Progressives and/or
17	PLOT or whoever it was, who performed a protective
18	barrier?
19	A. I believe one of them was Dava,
20	who had snuck in through the side door to hand him a
21	microphone.
22	Q. Okay.
23	A. The megaphone, not microphone,
24	megaphone.
25	Q. Oh, so she was the one who handed

	Page 296
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	him the microphone?
3	A. The megaphone, if I remember
4	correctly.
5	Q. Megaphone, sorry, okay. All
6	right. And you know she was a College Progressive
7	member?
8	A. Yes.
9	Q. And do you know if she was a PLOT
10	member?
11	A. I do not know.
12	Q. And do you know if any of these
13	other ten to fifteen individuals were College
14	Progressive members other than her?
15	A. I do not remember, no.
16	Q. And do you know if any of them
17	were PLOT members?
18	A. I do not know.
19	Q. Okay. Do you know why they
20	prevent they form a protective barrier?
21	A. I do not know, no.
22	Q. Police moving towards him at the
23	same time?
24	A. I don't remember. All I remember
25	is that they surrounded the speaker.

	Page 297
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay.
3	A. I don't know what their
4	intentions were, I'm not them.
5	Q. Okay. And did they do anything
6	else other than surround the speaker? In other
7	words, did they move in any direction?
8	A. Not that I remember.
9	Q. Okay. And let's go to paragraph
10	one eighteen that's on the next page, that is page
11	A. Uh-huh.
12	Q twenty-five of the complaint.
13	"During these events, Pelletier, acting pursuant to
14	the speech suppression policy directed the Pinkerton
15	agents to remove Dr. Laffer from the lecture hall."
16	Did I read that correctly?
17	A. Yes.
18	Q. Were you present when this
19	occurred?
20	A. I don't remember hearing it.
21	Q. Okay.
22	A. I was in the room, I assume, but
23	I don't remember seeing or hearing it.
24	Q. Okay. Did you say anything to
25	Dr. Laffer when the disruption began?

	Page 298
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Not that I recall.
3	Q. And did you speak with him after
4	he left the lecture hall at all, that night?
5	A. I may be waved goodbye as he ran
6	into his car.
7	Q. Okay. What did you do when
8	did he leave the lecture hall?
9	A. He was escorted out of the
10	lecture hall.
11	Q. By the Pinkerton agents?
12	A. I believe it was a mix between
13	the Pinkerton agents and U.P.D.
14	Q. Okay. And do you know if he did
15	that voluntarily, or whether someone told him to go,
16	or don't you know?
17	A. I do not know. All I remember
18	was someone from U.P.D. telling me it was time to go.
19	Q. When did they say that? After
20	lefter left after Laffer left or before?
21	A. I don't remember if it was before
22	or after.
23	Q. Okay. And when he said it's time
24	to leave, was he referring to you and the College
25	Republicans?

	Page 299
1 .	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. He was referring to us, yes.
3	Q. The College Republicans?
4	A. Yes.
5	Q. Okay. And did you leave then?
6	A. We were escorted out, yes.
7	Q. Was anyone threatening you in the
8	group?
9	A. Not that I recall.
10	Q. Okay.
11	A. There was a lot of shouting.
12	MR. CRAIG: Objection, vagueness.
13	When you say the group, who do you mean?
14	BY MR. MOORE: (Cont'g.)
15	Q. Was anyone in the lecture hall
16	threatening the College Republicans in any way?
17	A. I don't remember. There was a
18	lot of shouting, like I said.
19	Q. Okay.
20	A. There was a lot of voices.
21	Q. But you didn't specifically hear
2.2	anyone directing it towards the College Republicans?
23	A. No.
24	Q. Okay. Let's go to paragraph one
25	twenty-two. Pelletier's and U.P.D.'s minimal and

	Page 300
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	delayed efforts eventually removed the disrupter with
3	a megaphone, but only after he handed off the
4	megaphone so that others could continue to disrupt
5	the event and block Plaintiffs' expression. Were you
6	there for that?
7	A. I don't believe so.
8	Q. Okay. So when the megaphone
9	disrupter was removed, you were not in the room?
10	A. No, we were escorted out.
11	Q. Okay. And so you didn't see him
12	hand off the megaphone to anybody else?
13	A. Not that I recall.
14	Q. Okay.
15	MR. MOORE: Let's take a quick break,
16	Kevin and Amanda. Amanda, let me know when you get
17	there, but I'm going to ask about a few other things.
18	(Off the record)
19	BY MR. MOORE: (Cont'g.)
20	Q. You talked about Constitution Day
21	and the tabling you did at that?
22	A. Correct.
23	Q. Do do you remember what signs
24	College Republicans put up there?
25	A. I I don't.

	Page 301
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. How about a fair day, did
3	you put up any signs then?
4	A. On fair day, we had a free speech
5	ball.
6	Q. Okay. And what fly did you
7	hand out any flyers at either of those events?
8	A. I don't remember. I believe on
9	Constitution Day we handed out pocket constitutions.
10	Q. Okay. Did T.P. U.S.A. table on
11	Constitution Day?
12	A. Not that I recall.
13	Q. They they did they
14	basically start right before the tabling event on
15	campus here?
16	A. They I don't know when
17	remember when they started, but I believe it was be -
18	- pretty shortly before the tabling event.
19	Q. Are you aware of any other T.P.
20	U.S.A. tabling on campus other than the one on
21	November 14th, 2019?
22	A. Not that I recall.
23	Q. Did you have any office for the
24	College Libertarians?
25	A. Yes, we had an office.

	Page 302
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. And did you strike that.
3	Did you personally hold an office with
4	the College Libertarians?
5	A. Yes.
6	Q. And what office did you hold?
7	A. Originally, my sophomore freshman
8	year of college, I was the vice president. And then
9	the next year my soph my sophomore year of
10	Binghamton, my junior year, I should say, my second
11	year of Binghamton, I was
12	Q. Well, give me give me
13	semesters. You were there every semester. So you
14	started in your first semester there was fall
15	2018.
16	A. Uh-huh.
17	Q. Your last semester there was fall
18	2019, right?
19	A. Correct, on campus.
20	Q. Okay. So when were you vice
21	president for College Libertarians?
22	A. My first year there. That was
23	the first two semesters I was there.
24	Q. Okay. Got you.
25	A. Binghamton.

	Page 303
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. And what role did you hold, if
3	any, during fall 2019?
4	A. Fall 2019, I was the president.
5	Q. Of College Libertarians?
6	A. Correct.
7	Q. And of College Republicans?
8	A. Correct.
9	Q. And did you ever reserve any
10	tables for the College Libertarians during your
11	presidency?
12	A. Not that I recall.
13	Q. Did you ever revert reserve
14	any rooms during your time as a College Libertarian?
15	For the College Libertarian group?
16	A. I believe my first year when I
17	was the vice president, I did.
18	Q. Okay.
19	A. But
20	Q. Okay. Was anybody from
21	libertarians other than you present at the tabling
22	events in November 2019?
23	A. I believe Jon Lizak was a member
24	of the College Libertarians who showed up
25	occasionally, but other than that.

	Page 304
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. So Lizak was a member of
3	the Republicans, the Libertarians and also T.P.
4	U.S.A., correct?
5	A. As far as I know.
6	Q. All right. Was anybody from the
7	Libertarians other than you and Lizak present at the
8	Laffer event?
9	A. Potentially, I don't know.
10	Q. Okay. Potentially. I'm not sure
11	I understand the
12	A. I
13	Q. You say that word in that
14	context.
15	A. I don't
16	Q. Do you mean possibly?
17	A. Possibly.
18	Q. Okay.
19	A. Uh-huh.
20	Q. You just don't know?
21	A. I just don't know specific.
22	Q. Okay. All right. Have you
23	appeared anywhere else to speak on behalf of the
24	College Republicans as it pertains to either of these
25	events?

	Page 305
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2.	A. So I'm a little confused. You're
3	asking if I've ever spoke because the College
4	Republicans here invited me to speak?
5	Q. I know you did that once.
6	A. Right.
7	Q. Yeah. Have you ever appeared on
8	behalf of the College Republicans in any other
9	events, podcast
10	A. Yes.
11	Q or anything else like that?
12	A. Yes, I yes.
13	Q. What were those situations?
14	A. If I remember correctly,
15	Breitbart News reached out for comment. I did so
16	Q. About what?
17	A. About the event.
18	Q. Which event?
19	A. The tabling event.
20	Q. Okay.
21	A. If I remember correctly. The
22	Daily Wire reached out about the tabling event, if I
23	remember. And I did some work with Michael Vasquez
24	for No Soundbites Allowed.
25	Q. Okay. You appeared on his

	Page 306
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	program?
3	A. Yes.
4	Q. Okay. Was that it?
5	A. As far as I can remember, those
6	were the media appearances I did. Appearances as in,
7	they called me and asked me some questions.
8	Q. Okay. Were any the the one
9	the YouTube channel that was there's video of
10	that, correct?
11	A. Correct.
12	Q. Is there video of either
13	Breitbart News or Wire or those written statements?
14	A. Those were articles they
15	released.
16	Q. Got you.
17	Q. Was your appearance at Binghamton
18	in 2022 with the College Republicans recorded?
19	A. No, not that I remember.
20	Q. Is there tapes that you're aware
21	of?
22	No.
23	Q. Okay. What did you talk about?
24	A. I talked about some of my
25	internship experience in Washington D.C.

	Page 307
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Nothing about the tabling event?
3	A. No, I talked not that I
4	remember. I mostly, if I remember correctly, I
5	talked about my previous job working in Arizona, and
6	I talked about my time in D.C.
7	Q. Okay. Did College Republicans do
8	any fundraising other than the email we've already
9	spoken about involving some of these individuals?
10	A. Not that I recall.
11	Q. Okay. And were you involved at
12	all in the negotiation of the price of Laffer for him
13	to speak?
14	A. Not that I can remember.
15	Q. Okay. Did College Republicans
16	have an office on campus?
17	A. I believe they did.
18	Q. Well, you were the president for
19	one semester?
20	A. Correct.
21	Q. Was there an office you utilized
22	at that time?
23	A. We used a lot of the College
24	Libertarians office, but I don't remember
25	specifically where the College Republicans office

	Page 308
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2 ,	was. We used the College Libertarians office mostly.
3	Q. Was their space where the College
4	Republicans records were maintained?
5	A. Not that I recall.
6	Q. Was there a safe or any other
7	kind of space?
8	A. Like a physical safe, you mean?
9	Q. Yeah.
10	A. No.
11	Q. Okay. Is there a file cabinet
12	?
13	A. No.
14	Q. Okay. And does College
15	Republicans have any sort of electronic cache of
16	documents that is maintained?
17	A. I believe they have a Google
18	Drive still.
19	MR. MOORE: Okay. And okay. We'll
20	make a request for anything on that Google Drive.
21	MR. CRAIG: Yeah, If we haven't
22	already
23	MR. MOORE: Pertaining to Laffer
24	and/or tabling event.
25	BY MR. MOORE: (Cont'g.)

	Page 309
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Did you table to advertise the
3	socialism event? The problem with socialism?
4	A. I don't remember if we did.
5	Q. Okay. Just the case against
6	socialism, correct?
7	A. Correct, the
8	Q. Yeah.
9	A event was called the case
10	against socialism.
11	Q. Did you do any flyers to promote
12	that event?
13	A. We did have a flyer, correct?
14	Q. Okay. And was that posted on
15	campus?
16	A. I don't know if we posted on
17	campus. We posted on social media.
18	Q. Social media, okay. Got you.
19	And was that the way you advertised this event, on
20	social media?
21	A. Which event are you referring to?
22	Q. The case against socialism.
23	A. We did post it on social media to
24	promote it.
25	Q. Okay. And was there a Q.R. code

	Page 310
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	for the socialism event?
3	A. I believe there was, if I
4	remember correctly.
5	Q. Okay.
6	MR. MOORE: Do we have copies of that?
7	MR. CRAIG: I can check.
8	MR. MOORE: Yeah, we'll make a request
9	for that, too.
10	BY MR. MOORE: (Cont'g.)
11	Q. Okay. Do you know if T.P. U.S.A.
12	was recognized by S.A. at the time of the tabling
13	event?
14	A. If I remember correctly, they
15	weren't officially recognized.
16	Q. Okay. Was Lacey the president of
17	T.P. U.S.A. or do you know who the officers were?
18	A. If I remember correctly, Lacey
19	was the president of T.P. U.S.A.
20	Q. Okay. Do you know what the
21	purpose of the T.P. U.S.A. tabling was?
22	A. I don't know the purpose of it.
23	Q. The purpose of your tabling was
24	to promote the Laffer event, correct?
25	A. Correct.

	Page 311
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. And you handed out at least a
3	hundred and fifty flyers, correct?
4	A. Correct.
5	Q. Okay. Was a you've you
6	said that Laffer had appeared at an event after the
7	Laffer event where he did actually give his speech,
8	correct?
9	A. Correct.
10	Q. And that was on the the
11	YouTube podcast that we referenced earlier?
12	A. No Soundbites Allowed, yes.
13	Q. No Soundbites Allowed. Okay.
14	Was his lecture concerning free speech?
15	A. No.
16	Q. It was about economics, right?
17	A. Correct.
18	Q. All right. Why then did you have
19	free speech signs?
20	A. I don't remember why we had free
21	speech signs.
22	Q. And they were given to you by
23	YAF?
24	A. I remember them having a YAF
25	logo. So I assume they were given to me by YAF.

	Page 312
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Do you know if somebody
3	else in the group had a conversation with YAF about
4	the purpose of the free speech signs?
5	A. I don't know.
6	Q. Were you involved in any
7	conversation with YAF, whether you remember it or not
8	regarding the purpose of the free speech signs?
9	A. I don't remember.
10	Q. Okay. And was that handed to you
11	on the day of the Laffer event or prior to that?
12	A. I don't remember.
13	MR. CRAIG: Objection. Asked and
14	answered.
15	BY MR. MOORE: (Cont'g.)
16	Q. Okay. Let's watch a video. And
17	this is on a laptop. So if everybody else wants to
18	gather around, I I don't know any other way to do
19	it, but
20	MR. MOORE: Okay. But can we put on
21	the record at one point in the video this is.
22	THE REPORTER: Okay.
23	MR. MOORE: And I'd like to
24	MR. CRAIG: John, you're not going
25	back to the complaint, right, you're done with the

	Page 313
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. MOORE: I might. I got I just
3	don't know.
4	MR. CRAIG: Okay.
5	MR. MOORE: I think I probably have
6	some. You might want to keep that handy.
7	BY MR. MOORE: (Cont'g.)
8	Q. I'm going to mark as an exhibit
9	and show you Defendants' disclosure of documents
10	pursuant to F.R.C.P. Rule 26.
11	A. Okay.
12	Q. Have you ever seen this document
13	before today? These are our discovery responses in
14	this case.
15	MR. MOORE: You can hand this down the
16	line.
17	THE REPORTER: What number would you
18	like to be?
19	MR. MOORE: This is Defendants'
20	Exhibit Fifteen, sorry.
21	BY MR. MOORE: (Cont'g.)
22	Q. And I'm just show I'm
23	directing your attention to page two.
24	A. I have never seen this document
25	before, no.

	Page 314
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. I I didn't think you
3	did, but do you see at the top of the second page,
4	there's a line that says, video of the lecture hall
5	event taken from two angles in the lecture hall dated
6	November 18th, 2019. Do you see that?
7	A. I do see it.
8	Q. Okay. What I'm going to show you
9	now, and we'll mark this as part of Exhibit Fifteen.
10	And we can put it on a flash drive and send it to you
11	if you if you prefer having to
12	MR. CRAIG: I think we I think you
13	already provided this.
14	MR. MOORE: Yeah, I'm just trying to
15	make it clear what it is.
16	MR. CRAIG: Yep.
17	MR. MOORE: I'm letting you know now
18	that this video was something that was identified in
19	our April 4th, 2022, Rule 26 disclosures. I just
20	want to make sure the record is clear for purposes of
21	identification which video we're watching, so that we
22	all know what this exhibit is.
23	MR. MOORE: I was going to do that?
24	THE WITNESS: Try
25	MR. CRAIG: You want to go off the

	Page 315
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	record for a second?
3	MR. MOORE: Let's go off the record
4	for a second.
5	THE REPORTER: Yeah, no problem.
6	(Off the record)
7	(On the record)
8	THE REPORTER: On the record.
9	MR. MOORE: Okay. We're we're
10	watching a video, which is a surveillance video, to
11	my understanding, of the Laffer event from November
12	18th, 2019. And there's two screens on the video.
13	We're directing the witness's attention to the left
14	screen.
15	And can we stipulate that right now
16	we're at where where are we in this video? So
17	is this
18	MR. CRAIG: Seven twenty-one and
19	fifteen seconds p.m.
20	MR. MOORE: Okay. So this will be
21	approximately seven twenty-one and fifteen seconds
22	p.m. on that day. We're going to start watching the
23	video. Do we have a way of stopping it?
24	THE REPORTER: Yeah, you just click
25	this again.

	Page 316
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	MR. MOORE: Okay.
3	THE REPORTER: It's on the
4	BY MR. MOORE: (Cont'g.)
5	Q. Okay. Mr. Restuccia, do you see
6	yourself there in this video?
7	A. I don't.
8	Q. Okay. Do you see a guy with a
9	red hair, who's that? He's got a gray shirt on and
10	red
11	A. That is Joe Bernstein.
12	Q. Yeah.
13	A. I've mentioned him previously.
14	Q. Okay.
15	A. I do see myself now.
16	Q. Okay. There's a woman standing
17	next to him wearing a gray dress. Who's that?
18	A. I believe that's Lacey Kestager.
19	Q. Okay. And you are the person
20	making the statement at the podium right there?
21	A. Correct.
22	Q. Wearing a blue suit?
23	A. Correct.
24	Q. And glasses, correct?
25	A. I think it was a black suit, but

	Page 317
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	yes.
3	Q. Black suit. Okay. Looks
4	blueish.
5	Q. There's a woman in a orange dress
6	over there in that end of the she just stood up on
7	the first step.
8	A. Uh-huh.
9	Q. At seven twenty-one fifty-seven.
10	What who is she?
11	A. She is Bryn Lauer.
12	Q. Okay. And who's the fellow in
13	the red jacket?
14	A. That's Jon Lizak.
15	Q. Okay. And then there's a man in
16	between him and the red-haired fellow. What is
17	wearing a red tie. Who is that?
18	A. I don't see who you're talking
19	about.
20	Q. Right there.
21	A. I don't know.
22	Q. Okay. And then there's a shorter
23	guy right there behind Lacey. Who is that?
24	A. With the beard that, I believe,
25	is Preston Scagnelli, but

	Page 318
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay.
3	A the angles a little hard to
4	see.
5	Q. And next to Lizak with signs in
6	his hand, who is that?
7	A. I believe that's Kyle Nelson.
8	Q. Kyle Nelson. And everybody's got
9	signs in their hands already, correct?
10	A. From what I can see.
11	Q. Okay. Do you see Raj in here?
12	A. I do not, no.
13	Q. Okay. Do you see Dr. Laffer
14	here?
15	A. I see Dr I believe that's Dr.
16	Laffer, but the the site of the camera's not
17	great, but I believe he's wearing a blue tie.
18	Q. Blue tie, gray suit and he's
19	standing right next to the door at seven twenty-two
20	fifty-four, correct?
21	A. I believe that is Dr. Laffer.
22	Q. Okay. Do you recognize any of
23	the other individuals in that part of the
24	A. No, I don't.
25	Q. Okay. So you're still speaking.

	Page 319
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	We're at seven twenty-three zero six right now,
3	correct?
4	A. Correct.
5	Q. All right. And this is is
6	this the statement you gave to the and I know we
7	don't have sound, but is this the statement we gave
8	to the that you gave to the assemblage before Dr.
9	Laffer spoke?
10	A. I believe it is, but I can't hear
11	it. So I don't know.
12	Q. Okay. And you see there's some
13	other individuals in the audience who have free
14	speech signs, correct?
15	A. Yes, that I can see.
16	Q. Who are those people? Do you
17	recognize any of them?
18	A. One of them is Bobby Walker, I
19	believe.
20	Q. What is he wearing?
21	A. He is wearing a red hat and red
22	tie.
23	Q. Yep.
24	A. And the other, I believe, the
25	older gentleman next to him is named Michael

	Page 320
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Woodward.
3	Q. Okay. Got you. And who's the
4	fellow next to Walker? He's wearing a suit.
5	A. I don't know.
6	Q. Okay. Laffer is speaking. Let's
7	pause it right here. We've paused it at seven
8	twenty-three p.m. thereabouts. Do you see anywhere
9	in anyone there wearing PLOT insignia in that
10	group of people?
11	A. This group of people, I don't
12	from what I can see, I don't.
13	Q. Okay. And I'll direct your
14	attention to the right screen there. And for the
15	record, this is still sort of frozen at seven twenty-
16	one zero six. Do you see any individuals there
17	wearing PLOT insignia?
18	A. I can't tell what's on some of
19	their shirts. So I don't know.
20	Q. Okay. I don't see it, but I'm
21	asking you're the one who saw it in person. Do you
22	see any PLOT insignias anywhere there?
23	A. I remember there being people
24	wearing PLOT insignias, but I can't tell based on
25	this footage.

	Page 321
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Do you see I see one
3	person in the back there wearing a mask at the back
4	wall, correct? Looks like a woman?
5	A. Correct.
6	Q. And next to her, there appears to
7	be a person wearing a mask, correct?
8	A. Correct.
9	Q. Do you see anybody else in the
10	group? And this is on the left screen now. At the
11	top of the screen, I see two individuals standing at
12	the back wearing masks, possibly three of them. You
13	see those three people right there?
14	A. I see yes.
15	Q. Okay. Do you see anybody else
16	wearing a mask in the audience on either screen?
17	A. On either screen, yes.
18	Q. Where? Can you point out?
19	A. I see one right there. Can you
20	see?
21	Q. Yeah, well, I see a a dark-
22	skinned fellow there, but I seem to see his mouth. I
23	think that might be a black beard, but I'm not
24	positive, but you're
25	A. Oh, I don't know. I can't tell

	Page 322
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	with this footage.
3	Q. Okay. So would you agree with me
4	that other than the possible individual on the right
5	side, the right screen standing the third fourth
6	row up, and then these three individuals in the back
7	here in the back, I don't see anybody else wearing
8	masks, correct?
9	A. From what I can see on this
10	security footage, which is a little hard to see, I do
11	not.
12	Q. Okay. And I am also going to ask
13	you during and I'm not going to ask you
14	specifically again. But if you see anyone during the
15	course of watching this video, again, who's wearing
16	PLOT insignia, please point them out to me, okay?
17	That's a standing question.
18	A. Okay.
19	Q. And we'll we'll put make
20	that part of the record. But right now we can agree
21	we don't see anybody specifically wearing anything
22	with the word PLOT on it, right?
23	A. I cannot see anyone based on what
24	footage you have right here.
25	Q. Okay. And we also talked about

	Page 323
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	one individual you recognize from College
3	Progressives, right?
4	A. Correct.
5	Q. What was her name?
6	A. Dava.
7	Q. Do you see her in any of the
8	either of these
9	A. Not
10	Q camera?
11	A that I can see.
12	Q. Okay. All right. So let's hit
13	go. We're going to keep going here. So that's Dr.
14	Laffer at the podium now at seven twenty-three at
15	seven twenty-four, correct?
16	A. Correct.
17	Q. Then you start speaking, right?
18	A. Uh-huh.
19	Q. Okay. So we will let him speak
20	until a fellow stands up with a phone at seven
21	twenty-four twelve, correct?
22	A. Correct.
23	Q. Is he wearing PLOT insignia?
24	A. I don't see anything, no.
25	Q. But he's a dark-skinned man with

	Page 324
1.	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	a beard and black clothing, correct?
3	A. Correct.
4	Q. He doesn't have a mask on, does
5	he?
6	A. I don't see a mask on him.
7	Q. And he appears to be reading from
8	his phone, correct?
9	A. Correct.
10	Q. Can't hear what he said? Okay.
11	And then there's another person walking down with a
12	megaphone, correct? Do you see that person?
13	A. Correct.
14	Q. And this is at seven twenty-four
15	forty-two. He hands the megaphone to the speaker and
16	people applaud, correct?
17	A. Correct.
18	Q. Okay. So he begins speaking
19	through the megaphone. He's now speaking through the
20	megaphone. And at this point, the College
21	Republicans stand up immediately. And this is seven
22	twenty-four, about fifty, with free speech signs,
23	correct?
24	A. We were already standing.
25	Q. Okay. And they line up in front

	Page 325
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	of Laffer. That is all of you. You go grab a free
3	speech sign off a table, correct? That's you?
4	A. I believe that's me.
5	Q. Okay. And so
6	A. I can't get a good angle because
7	
8	Q. There are one, two, three, four,
9	five, six seven College Republicans standing with
10	free speech signs, correct?
11	A. As far as I can see.
12	Q. And at seven twenty-five, there
13	appear to be police getting near the speaker,
14	correct?
15	A. From what I can see
16	Q. There's a police officer about
17	three
18	A. I see someone with a PLOT hoodie.
19	Q. Okay.
20	A. Woman in red. If you go back.
21	Q. Yup.
22	A. You can see the logo.
23	Q. Okay. I see. And she has a mask
24	on as well, correct?
25	A. Correct.

	Page 326
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. And police, at this point, seven
3	twenty-five forty-four are attempting to restrain
4	some of the protesters and getting close to the
5	speaker, correct?
6	A. From what I can see.
7	Q. Okay. And no one has approached
8	Dr. Laffer, correct?
9	A. Not that I can
10	Q. And
11	A. Well, there were some people
12	cutting if you can see someone cut right in front
13	and some people are starting to cut in front.
14	Q. But they're looking towards the
15	speaker, correct?
16	A. That
17	Q. Not towards Dr. Laffer.
18	A. Correct.
19	Q. They're looking towards the
20	disrupter, we'll call him. The megaphone disrupter.
21	A. Correct.
22	Q. And there are police surrounding
23	the mega now the police are restraining a man,
24	correct?
25	A. Yes, from what I can see.

	Page 327
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. That's at about seven twenty-six
3	ten and they're moving towards the megaphone
4	disrupter, correct?
5	A. Which man are you discussing?
6	Q. There's a man being led out right
7	now. The man who handed the microphone to the
8	megaphone disrupter.
9	A. You can see a PLOT member right
10	there.
11	Q. Okay. So we see two people with
12	PLOT insignias, correct, so far?
13	A. Correct.
14	Q. And the police are surrounding
15	the speaker, correct?
16	A. That looks like a PLOT armband on
17	a man.
18	Q. Okay.
19	MR. MOORE: Yeah, let's rewind a
20	little, Amanda. So we
21	BY MR. MOORE: (Cont'g.)
.22	Q. So now we've been concentrating
23	on the on the actions of the police going near the
24	disrupter, correct?
25	A. I've been trying to

	Page 328
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Let's go back to seven twenty-
3	five.
4	A. Okay.
5	MR. MOORE: Okay. Just stop it right
6	there.
7	BY MR. MOORE: (Cont'g.)
8	Q. Seven twenty-four fifty-six.
9	MR. CRAIG: I'm not going to touch it.
10	THE REPORTER: No worries. I like
11	having my mouse, there you go.
12	MR. MOORE: Okay.
13	BY MR. MOORE: (Cont'g.)
14	Q. So we're twen seven twenty-
15	four fifty-nine. At this point, the free speech
16	signs were up, correct? And we see a police officer
17	moving towards the disrupter, correct?
18	A. From the back of the room?
19	Q. Yes.
20	A. He is just moving towards the
21	front. I don't know if he's going toward the
22	disrupter.
23	Q. Okay. And there's another police
24	officer. You'll see come screen right, correct?
25	Right there, there's police officer moving towards

	Page 329
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	the megaphone disrupter
3	A. That appears to be
4	Q at seven twenty-five thirty.
5	A. That appears to be.
6	Q. Okay. So we've talked about
7	that. Let's concentrate on on Dr. Laffer. So on
8	the side of the room where the College Republicans
9	are now and we're at seven twenty-five forty-three.
10	You turn back and say something to Dr. Laffer. What
11	did you say?
12	A. I don't remember.
13	Q. Okay.
14	A. I don't.
15	Q. And there's two individuals
16	there, Laffer and another man talking. Do you know
17	who those people are?
18	A. I do not.
19	Q. Okay. Now you see another man
20	who's standing near you and Laffer, who's talking to
21	the other man you couldn't identify. Do you know who
22	those people are?
23	A. No, I do not.
24	Q. Okay. Do you know what was said,
25	you were right there?

	Page 330
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't know.
3	Q. Okay. I want you to watch
4	yourself now.
5	A. Okay.
6	Q. Seven twenty-six thirty-one, you
7	turn around and are saying something to Dr. Laffer
8	and you put your hand on his back and start walking
9	him towards the door. What is being said there?
10	A. I don't know.
11	Q. Okay. But you agree that you say
12	something to Dr. Laffer, you put your hand on his
13	back and you lead him out the door, correct?
14	A. From what I saw in the video,
15	that's
16	Q. You walk out the door with him?
17	A. From what I saw in the video,
18	yes.
19	Q. That occurred. Okay. And you
20	don't remember anything anyone said at that point?
21	A. All I remember was saying
22	someone who, I believe, was from U.P.D. saying, it's
23	time to go.
24	Q. Okay. But you don't know who
25	that person was?

	Page 331
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't know. All I remember was
3	someone from U.P.D. saying, it's time to go.
4	Q. Okay. And that's all I have with
5	this video. When you saw when Laffer left, the
6	College Republicans seem to leave around the same
7	time, correct?
8	A. Correct.
9	Q. Where did you go from there?
10	A. We went out the back door.
11	Q. Okay. Did you have any
12	conversations with Laffer at this time?
13	A. He tripped on he's older, so
14	he tripped on the stairs, and I made sure he was
15	okay.
16	Q. Okay. Did he fall or did you
17	just sort of prevent him from falling?
18	A. Oh, he started to trip forward.
19	Q. Okay. When you left the lecture
20	hall, where did you go other than out back? Did you
21	have any conversations with Laffer other than
22	assisting him when he stumbled?
23	A. All I can remember, to the best
24	of my recollection, I waved goodbye.
25	Q. Okay. Where do you go from

	Page 332
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	there?
3	A. We went to the Outback Steakhouse
4	parking lot.
5	Q. How far away is is that off
6	campus?
7	A. That's off campus.
8	Q. Okay.
9	A. About five minutes.
10	Q. All right. Did you hang out in
11	the parking lot or did you go in and get a meal?
12	A. Well, a couple of people came to
13	the parking lot. They were asking where we were
14	because I wanted to get everyone off the campus
15	safely.
16	Q. Uh-huh.
17	A. Of who are members of the club,
18	so I drove a couple of them. I don't remember how
19	the rest got there, but we drove to the Outback
20	Steakhouse parking lot. Jeff Coghlen showed up
21	eventually as well as some of the other people who
22	are donors. And Bobby Walker as well, if I remember.
23	Q. And were all of the people we
24	identified on the video who were College Republicans,
25	were all those people did all of those people

	Page 333
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	leave with you at the same time?
3	A. I don't remember.
4	Q. Okay. Do you know if anybody
5	from the College Republicans went back into the hall
6	after you left this group?
7	A. Not that I know of.
8	Q. Okay. And you didn't go back in
9	the hall, correct?
10	A. No.
11	Q. So you don't know what occurred
12	thereafter?
13	A. I do not know.
14	Q. Okay. Let's go back to the
15	complaint, which I think attorney may have had and
16	I'm going to direct your attention to paragraph one
17	thirty of the complaint.
18	A. Sure.
19	Q. And I'm going to read out this
20	is paragraph
21	THE WITNESS: Before we start, can I
22	just have a second with my attorney to catch my
23	breath and everything?
24	MR. MOORE: Sure.
25	BY MR. MOORE: (Cont'g.)

	Page 334
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Mr. Restuccia, were you a party
3	to any discussion with Dr. Laffer about waiting
4	around for the police to disperse protesters?
5	A. Not that I remember.
6	Q. Okay. Why not? Why was there no
7	discussion about that that you're aware of?
8	A. If I remember, Dr. Laffer was
9	escorted out as quickly as possible by University
10	Police.
11	Q. Was it by University Police or
12	the Pinkerton agents?
13	A. If I remember correctly, it was
14	both.
15	Q. Okay. But do you know who from
16	University Police was involved in it?
17	A. I do not.
18	Q. Okay. Do you know how many
19	officers from University Police were involved in
20	that?
21	A. I do not.
22	Q. Was it one?
23	A. I don't I don't know.
24	Q. Did you have any discussions with
25	U.P.D. after the Laffer event?

	Page 335
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't remember.
3	Q. Okay. Did you have any
4	discussions with anybody from B.U. after the Laffer
5	event? On the night of the Laffer event?
6	A. Just to clarify, are you talking
7	about discussions about the Laffer event?
8	Q. Yeah.
9	A. Okay. I don't remember.
10	Q. Okay. You don't remember meeting
11	with anybody from B.U. after the event? Either that
12	day or on some other day?
13	A. Do when you say, B.U., do you
14	do you mean the administration or employees here?
15	Q. Start with the administration, or
16	if there's someone else, please let me know.
17	A. Not that I remember meeting with
18	the administration.
19	Q. Did you meet with anybody from
20	U.P.D.?
21	A. Not that I can remember.
22	Q. Okay. Did you have any
23	discussions with Laffer security team about Dr.
24	Laffer leaving?
25	A. No, I if I remember correctly,

	Page 336
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	they left with Dr. Laffer, so.
3	Q. Who paid for Dr. Laffer's
4	security agents?
5	A. I don't know.
6	Q. Did College Republican hold
7	College Republicans hold any meetings after the
8	Laffer event that semester while you're still
9	president?
10	A. Yes.
11	Q. How many?
12	A. I don't remember.
13	Q. Was it more than one?
14	A. Could have been two or three, but
15	again, I don't remember the specific number.
16	Q. Do you know if there are any
17	speakers at any of those meetings?
18	A. Not that I can recall.
19	Q. Okay. Let's go back to paragraph
20	one thirty. And this reads. "Stenger and Rose how -
21	- did however cause SUNY Binghamton to take action
22	against College Republicans. The day after the
23	University had once again violated their
24	constitutional rights, the Student Association, which
25	is controlled by SUNY Binghamton administration, sent

	Page 337
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	College Republicans a two-line email informing them
3	that they were being suspended due to their violation
4	with both University and Student Association policies
5	in regards to tabling without proper approval on
6	Thursday, November 7th 14th."
7	Did I read that correctly?
8	A. Correct.
9	Q. And if you look at the very last
10	page of the complaint, that pile that is in front of
11	you.
12	Q. The very last page?
13	A. The very final page.
14	Q. Is it Exhibit Nine?
15	A. Exhibit Nine.
16	Q. Okay. Is that the email that is
17	referred to in paragraph one thirty?
18	A. It appears to be the email.
19	Q. Okay. I'm going to show you
20	what's been marked as Defendants' or Defendants'
21	Exhibit Thirteen, and this is Bate stamped page three
22	sixteen from Plaintiffs' disclosures.
23	A. Uh-huh.
24	Q. And is this the email? Another
25	copy of the same email?

	Page 338
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. It appears to be.
3	Q. Okay.
4	MR. CRAIG: I just want to make sure
5	you keep the
6	THE WITNESS: Okay.
7	MR. CRAIG: exhibits together.
8	THE WITNESS: Keep this together?
9	MR. CRAIG: Yeah.
10	THE WITNESS: Keep this together?
11	This is how okay.
12	MR. CRAIG: I'm sorry, John.
13	MR. MOORE: That's okay.
14	BY MR. MOORE: (Cont'g.)
15	Q. And Exhibit Thirteen. What is
16	the background of this exhibit? There appears to be
17	a symbol in the words, campus reform a project of the
18	leadership institute.
19	A. I believe that's the campus
20	reform. A project of the leadership institute.
21	Q. Okay. I can read. What is that?
22	A. It is a news publication that
23	reports on liberal bias at campuses.
24	Q. Okay. So where did this version
25	of the email with campus reforms logo behind it come

	Page 339
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	from?
3	A. Where did this specific I'm a
4	little confused. Are you talking about where did
5	this image come from with the logo behind it, or the
6	email?
7	Q. Yes.
8	A. I'
9	Q. Well, the email is from S.A.,
10	correct?
11	A. Correct.
12	Q. It appears to be sent from Aaron
13	Bishop, the Executive
14	A. Uh-huh.
15	Q Vice President of the Student
16	Association at Binghamton University Incorporated,
17	correct?
18	A. Correct.
19	Q. And it was sent to College
20	Republicans S.A.?
21	A. It appears to be, but they
22	blocked out the Binghamton S.A.
23	Q. Would did you receive this
24	email?
25	A. Yes.

	Page 340
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. And did you receive it on your
3	the College Republican's email address?
4	A. Correct.
5	Q. Okay. And is that what that is?
6	A. Right.
7	Q. Other than what's blacked out?
8	A. Yes.
9	Q. Okay. Who's Matthew Johnson who
10	cc'ed?
11	A. I don't know.
12	Q. Okay. And this email ref
13	reads. "Good morning. I'm emailing to inform you
14	that the Be There account for College Republicans has
15	been suspended due to your violation with both
16	University and Student Association policy in regards
17	to tabling without proper approval on Thursday,
18	November 14th. Let me know if you have any
19	questions. Best Aaron."
20	Did I read that correctly?
21	A. Correct.
22	Q. Okay. So this tells you that
23	your your be Be There account was suspended?
24	A. Correct.
25	Q. Okay. What's the Be There

	Page 341
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	account?
3	A. I don't remember what the Be
4	There account is. But if I remember correctly, I
5	think that's the process that we use to book rooms.
6	Q. Okay. So the College Republicans
7	weren't suspended as a group, correct?
8	A. Well, it's kind of impossible to
9	have a group when you can't book rooms or meeting
10	rooms.
11	Q. Okay. But you said you had two
12	or three meetings after the Laffer event, correct?
13	A. Correct.
14	Q. And this was sent the day after
15	the Laffer event, correct?
16	A. Correct.
17	Q. So that this suspension of the
18	Be There account did not prevent you from having
19	three meetings, correct? Or two, whatever the number
20	may have been?
21	A. We still were going to have
22	meetings, but we saw this as an attempt to stop us
23	from having
24	Q. Okay. I didn't ask for your
25	characterization of it. What my question was, was

	Page 342
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	the suspension of your Be There account did not
3	prevent College Republicans from from conducting
4	two or three meetings before the end of the semester,
5	correct?
6	A. Correct.
7	Q. Okay. That's all I was asking.
8	Have you ever did you ever get in touch with Aaron
9	Bishop about any questions?
10	A. I believe I responded to the
11	original email.
12	Q. Okay. And what did you say?
13	A. Our attorneys will be in touch,
14	if I remember correctly.
15	Q. Okay. I'll just show you what's
16	been marked as Defendants Exhibit Fourteen. This is
17	from Defendant S.A.'s disclosure.
18	A. Uh-huh.
19	Q. And it looks like there Exhibit
20	N, which is Bates stamped N one through four. And I
21	will hand you the exhibits. I will hand your
22	attorney one and pass it down one.
23	And if you look on the second page of
24	Defendants' Exhibit Fourteen. Do you see the email
25	you just referenced halfway through page?

	Page 343
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Correct.
3	Q. And it says, yes, our attorneys
4	will contact you soon?
5	A. Yes.
6	Q. Okay. If you see as you sit
7	here today, do you know if College Republican's
8	attorneys contacted the S.A.?
9	A. I don't know.
10	Q. Okay. And I'm not asking you
11	about any conversations you had with any attorneys,
12	but can you tell me what attorneys this referred to?
13	A. I don't know.
14	Q. You don't know?
15	A. I well, I
16	Q. You're the you're the
17	president of the College Republicans, correct?
18	A. Correct.
19	Q. Do the College Republicans have a
20	law firm representing them as of this point?
21	A. Not at that time, but we were
22	discussing if we wanted to or not.
23	Q. Okay.
24	A. We were considering legal
25	counsel.

	Page 344
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. So when you said our attorneys
3	will be in touch, you hadn't yet retained any
4	attorneys, correct?
5	A. No.
6	Q. And again, I'm not asking you
7	about any contact you had with attorneys, whether it
8	be Mr. Hamilton's firm or anybody else. What I'm
9	asking is, were there attorneys in place at this time
10	to contact the S.A.?
11	A. No.
12	Q. Okay. Were any of the Defendants
13	copied on this email other than S.A. of course? Do
14	you see Defendant Stenger, Rose or Pelletier copied
15	on this email?
16	A. Appears I guess vice it
17	says, executive vice president S.A. to Harvey.
18	Q. Okay. What what page is that?
19	A. That's on page
20	Q. See the top right.
21	A. Yup. N zero zero zero zero
22	one.
23	Q. Okay. N zero zero one.
24	A. Uh-huh.
25	MR. SAITTA: Which exhibit is this

	Page 345
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	again?
3	MR. CRAIG: Exhibit N.
4	BY MR. MOORE: (Cont'g.)
5	Q. And you're looking at the bottom
6	of the page?
7	THE REPORTER: Defendants' Fourteen.
8	MR. SAITTA: Okay.
9	THE WITNESS: Yes, I see two. I'm a
10	little confused.
11	BY MR. MOORE: (Cont'g.)
12	Q. Harvey. Is that the recipient
13	you're talking about?
14	A. Yes, I see that.
15	Q. Okay. Do you see Defendant Rose,
16	Stenger or Pelletier copied on any of these emails?
17	A. Not that I can see.
18	Q. Okay. Do you have any personal
19	knowledge that the Defendant Stenger cause SUNY
20	Binghamton to take action against College Republicans
21	by having the S.A. suspend the College Republicans Be
22	There account?
23	A. Can you repeat the question?
24	Q. Do you have any personal
25	knowledge that Defendant Stenger caused SUNY

	Page 346
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Binghamton to take action against College Republicans
3	by having the S.A. suspend College Republicans Be
4	There account?
5	A. I don't know.
6	Q. Do you have any personal
7	knowledge that Defendant Rose caused SUNY Binghamton
8	to take action against College Republicans by having
9	the S.A. suspend College Republicans Be There
10	account?
11	A. I do not know.
12	Q. Do you know if either Defendant
13	had any involvement whatsoever in the decision to
14	send the email that we've marked as Exhibit Thirteen,
15	which is also included as part of Exhibit Fourteen?
16	A. I I do not know.
17	Q. And other than your email about
18	attorneys, did you or anybody else from College
19	Republicans take any other action to respond to the
20	email we've marked as Exhibit Thirteen?
21	A. We put out a Facebook posts to
22	let people know that our meeting that day was
23	canceled.
24	Q. Okay. Got you. And did you
25	write any other responses directly to S.A.?

	Page 347
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Not that I remember.
3	Q. Okay. Paragraph one thirty-one
4	from the complaint, which is on page twenty-seven.
5	And you might as well keep it with him because we're
6	we're going to have a few more paragraphs I'm
7	going to ask him about. So paragraph one thirty-one
8	reads. "On information and belief, Stenger, Rose and
9	the Student Association have not required other
10	groups to obtain approval before camp tabling on
11	campus."
12	Did I read that correctly?
13	A. Correct.
14	Q. What is the basis do do you
15	have any knowledge regarding this contention?
16	A. Not that I know of.
17	Q. Okay. In other words, do you
18	have any id do you have any knowledge that other
19	groups were allowed to table without getting approval
20	on campus?
21	A. Can you repeat that one more
22	time?
23	Q. Do you have any knowledge that
24	any groups were not required to obtain approval for
25	tabling before doing so on campus?

	Page 348
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I remember see well,
3	College Libertarians, I remember tabled out
4	permission, if I remember correctly. But other than
5	that, I don't know.
6	Q. Okay.
7	A. I remember als
8	Q. College Libertarians as
9	conservative group?
10	A. They're a Libertarian
11	organization.
12	Q. Okay. Would you did you
13	you describe them earlier as a conservative group.
14	Didn't you?
15	A. Not that I know of. I
16	Q. All right.
17	A. They're a Libertarian
18	organization.
19	Q. Okay. All right. I mean, I'm
20	just trying to characterize your earlier statement.
21	We can
22	A. Uh-huh.
23	Q review to refer to the
24	record on that. Were there any other groups that
25	you're aware of that Stenger, Rose or the Student

	Page 349
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Association did not require to obtain approval for
3	tabling on campus before they did so?
4	A. Not with a specific table in
5	front of them, but there were protests and things
6	that
7	Q. Okay. I didn't ask about
8	protests. I asked about tabling.
9	A. Right.
10	Q. So you're not aware of any other
11	tabling?
12	A. Not aware of any outreach by
13	clubs that involved having a table in front of them.
14	Q. Okay. Paragraph one thirty-two.
15	"This punishment was an unconstitutional enforcement
16	of the University's tabling policy because it was
17	motivated not by College Republicans' decision to not
18	obtain a permit, but by Stenger, Rose and the student
19	association's disagreement with College Republicans
20	and Y.A.F.'s views."
21	Did I read that correctly?
22	A. Correct.
23	Q. Do you know that Defendant
24	Stenger disagreed with College Republicans' views?
25	A. I remember Harvey Stenger going

	Page 350
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	on Bob Joseph to talk and Bob Joseph is a liberal
3	radio host in the area.
4	Q. Okay. But that wasn't my
5	question. The question was, do you know whether
6	Defendant Stenger disagreed with College Republicans'
7	views?
8	A. I can't speak for Harvey Stenger.
9	Q. Okay. Do you know whether
10	Defendant Rose disagreed with any of College
11	Republicans' views?
12	A. I can't speak for Mr. Rose.
13	Q. Okay. Do you know how long the
14	College Republicans' Be There account was suspended
15	for?
16	A. I do not know.
17	Q. Was there any other suspensions
18	issued to the College Republicans other than the
19	email we discussed as Exhibit Thirteen?
20	A. Not that I know of.
21	Q. Was there any effort made to
22	appeal that decision? The suspension?
23	A. I do not know.
24	Q. You had left campus at the end of
25	that semester, correct?

	Page 351
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Correct.
3	Q. And that would have ended before
4	Christmas. Is that correct?
5	A. Correct.
6	Q. And you did not return to campus
7	or have any involvement with College Republicans
8	other than your speaking appearance, correct?
9	A. I called some of the members for
10	social calls to check up how the club was doing in
11	general.
12	Q. Yeah. Okay. And did they tell
13	you about any events they had hosted?
14	A. They talked to me about the Tom
15	Reed event.
16	Q. Okay. And College Republicans
17	are currently a functioning group at B.U. as far as
18	you know, correct?
19	A. As far as I'm aware.
20	Q. You appeared at one of their
21	events last year, correct?
22	A. Correct, I appeared at one of
23	their meetings.
24	Q. Okay. And do you know if or when
25	that group status as an approved Be There account was

	Page 352
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	restored and under what circumstances?
3	A. I don't know.
4	Q. Okay. Paragraph one thirty-four.
5	I will read it into the record. "Plaintiffs' College
6	Republican and Lizak met with Defendant Stenger and
7	Rose on January 20, 2020 to discuss the tabling
8	events incident and the Dr. Laffer event. This
9	meeting was facilitated by Congressman, Thomas Reid,
10	the U.S. representative for New York's 23rd
11	congressional district, who also attended."
12	Did I read that correctly?
13	A. Correct.
14	Q. Were you present at this meeting?
15	A. No.
16	Q. Do you have any idea who recorded
17	that meeting?
18	A. I don't.
19	Q. Paragraph one forty-five. We're
20	going to couple pages forward. And this reads. "By
21	failing to perform their constitutional duty to
22	protect Plaintiffs' free speech activity in the form
23	of the Dr. Laffer event, and by actively encouraging
24	participating in and permitting the disruption of
25	that event, Stenger, Rose and Pelletier caused

	Page 353
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	financial damages to the Plaintiffs totaling thirty-
3	seven thousand three seven hundred and seventeen
4	dollars and ninety-three cents. This total includes
5	Dr. Laffer's honorarium, transportation and private
6	security, YAF's flights, transportations, meals and
7	accommodations, and the hiring of an event
8	photographer and mailing of marketing materials."
9	Did I read that correctly, sir?
10	A. Correct.
11	Q. Who paid this thirty-seven
12	thousand seven hundred and seventeen dollars and
13	ninety-three cents?
14	A. I don't know.
15	Q. Do you have any idea who that sum
16	was paid to?
17	A. I don't know.
18	Q. Did any of that come from College
19	Republican funds?
20	A. I do not know.
21	Q. Do you know what Dr. Laffer's
22	honorarium was and what that term refers to?
23	A. I don't. I don't know the word.
24	Q. And do you know what portion of
25	the thirty-seven thousand dollars and change was Dr.

Page 354
B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
Laffer's honorarium?
A. I don't know.
Q. Do you have any idea of how much
was paid for transportation?
A. I do not.
Q. By the Plaintiffs?
A. I do not. I do not know.
Q. Do you know how much was paid for
private security by the Plaintiffs?
A. I do not know.
Q. Do you know how much was paid for
YAF's flights?
A. I do not know.
Q. Do you know who from YAF flew to
the event?
A. I know Dr. Laffer did, but other
than that, I don't know.
Q. Okay. Was there anybody from YAF
present at the event?
A. Yes.
Q. Who?
A. Raj Kanopolin Kanopolin (sic).
Q. Raj Kannappan?
A. Yes.

Case 3:20-cv-00822-LEK-TWD Document 254-9 Filed 06/21/23 Page 356 of 451

800.523.7887

	Page 355
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. And did he fly in from
3	somewhere?
4	A. I don't know.
5	Q. Do you know where he flew in
6	from?
7	A. I don't know if he flew.
8	Q. Okay. Do you know what meals he
9	ate while he was there?
10	A. I do not know.
11	Q. Do you know who paid for those
12	meals?
13	A. I do not know.
14	Q. Do you know where he stayed while
15	he was in Binghamton?
16	A. I do not know.
17	Q. Did you pay for the event
18	photographer?
19	A. Not that I'm aware of.
20	Q. Do you know who did?
21	A. I do not know.
22	Q. Do you know how much the fee was?
23	A. I do not know.
24	Q. Okay. And the marketing
25	materials. Who mailed marketing materials and to

	Page 356
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	whom were they mailed?
3	A. I don't know.
4	Q. Okay. And do you have any idea
5	how was ex how much was expanded upon the mailing
6	of marketing materials?
7	A. I do not know.
8	Q. Does College Republicans keep
9	financial books of records regarding contributions
10	and donations?
11	A. I don't know.
12	Q. Did you know this when you were
13	the College Republicans president?
14	A. Not that I'm aware of.
15	Q. Okay. And you didn't maintain
16	any records regarding finances during your time there
17	
18	A. No.
19	Q as the president?
20	A. Not that I'm aware of.
21	Q. Okay. Paragraph one forty-six.
22	"Plaintiffs desire to once again host Dr. Laffer and
23	similar speakers on SUNY Binghamton's campus.
24	However, Plaintiffs reasonably fear that if they do,
25	Stenger, Rose and Pelletier will again enforce the

	Page 357
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	speech suppression policy to conspire with, encourage
3	and permit disruptors, including College Progressives
4	and PLOT to engage in disruptive and disorderly
5	contact conduct designed to suppress Plaintiffs'
6	message."
7	Did I read that correctly?
8	A. Correct.
9	Q. Do you know if there have been
10	speakers hosted by the College Republicans on campus
11	Since Dr. Laffer?
12	A. I do not know.
13	Q. Okay. There might have been,
14	there might not have been. You just don't know
15	personally?
16	A. I just don't know personally.
17	Q. Because you weren't involved
18	after after December 2019, correct?
19	A. Correct.
20	Q. Okay. We have a recording we
21	want to play it for you. And I will state for the
22	record again with reference to Exhibit Fifteen that
23	this is I don't know if you have Fifteen in front
24	of you. But this is also referenced on page two.
25	A. Exhibit Fifteen I'm looking for?

	Page 358
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Fifteen, yeah.
3	A. Okay.
4	Q. On page two at the very top of
5	page two of that, there's a Twitter address.
6	A. Okay.
7	Q. And that's a recording of some
8	people talking. And I'm I'm going to ask that my
9 .	colleague, Ms. Kuryluk, play that for you now and ask
10	you to listen. It's only about two minutes long. If
11	you can't hear it at any point, let us know.
12	A. Okay.
13	MR. MOORE: Show him there's some
14	there's some commentary on this one.
15	BY MR. MOORE: (Cont'g.)
16	Q. You see some other words. Some -
17	- some words on the screen of this Twitter post?
18	A. I do, yes.
19	Q. Have you ever seen this before
20	today?
21	A. I have not, no.
22	(Recording playing)
23	Q. Have you ever heard this
24	recording before today?
25	A. No.

	Page 359
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Do you recognize any of
3	the voices on it?
4	A. Sounded like Lacey Kestager. One
5	of the voices sounded like Brian Murray
6	Q. Okay.
7	A to me, but I don't know
8	because I wasn't there.
9	Q. Okay. So your voice does not
10	appear on this?
11	A. No.
12	Q. Okay. Do you know who recorded
13	this?
14	A. If I remember correctly, I heard
15	it was a Fisel Allam (phonetic spelling), I believe,
16	potentially.
17	Q. A Fisel Allam. What does that
18	mean?
19	A. That's the person's name.
20	Q. Oh.
21	A. Allam.
22	Q. Is who who is Fisel Allam?
23	A. I believe he showed up to one or
24	two College Libertarians meetings, but that's the
25	extent that I know him.

800.523.7887

	Page 360
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. All right. He wasn't a College
3	Republican's member?
4	A. Not that I know of.
5	Q. Did he work for a paper?
6	A. Not that I know of.
7	Q. Okay. Do you know what date this
8	was recorded on?
9	A. I don't.
10	Q. Okay.
11	A. I do know that the record I
12	heard there was a recording that came out, but I was
13	in D.C. at the time.
14	Q. Okay. I was just wondering if
15	you can identify who was on there. Okay.
16	MR. MOORE: That's all I have for now.
17	Tom, you got anything?
18	MR. SAITTA: I do, just a little bit.
19	MR. MOORE: Okay. I'm going to pass
20	the the baton to S.A.'s attorney and
21	MR. SAITTA: Okay.
22	THE WITNESS: Okay.
23	MR. MOORE: I may have a little more
24	when he's done.
25	MR. SAITTA: Okay.

	Page 361
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	CROSS-EXAMINATION
3	BY MR. SAITTA:
4	Q. My name is Tom Saitta. I'm
5	representing the Student Association in this
6	litigation. I'll be asking you a series of questions
7	and same rules as before.
8	A. Okay.
9	Q. I'll try to let you answer before
10	I ask another question, if you let me finish before
11	I, you know, you answer my question.
12	A. Okay.
13	Q. If you want to take a break, if
14	you don't understand anything, just say that.
15	A. Okay.
16	Q. I don't know is a perfectly
17	legitimate response. We don't want you to have to
18	guess unless I ask you for an approximation. And
19	then, if you feel you can't give me one, just say
20	that.
21	A. Okay.
22	Q. Okay. I'll I'll direct your
23	attention to paragraph forty of Exhibit One, which is
24	summons and complaint.
25	A. Okay. Where are we going?

	Page 362
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Paragraph forty.
3	A. Paragraph forty. Okay.
4	Q. The second to last line or the
5	second line of paragraph forty talks about the
6	administration retains the power to direct Student
7	Association decisions. Are you aware of the basis
8	for this claim? Do you have any knowledge of that
9	personally?
10	A. I don't.
11	Q. Okay. And do you know whether or
12	not there's any in in withdrawn.
13	Have you ever seen any document or
14	written policy that allows the administration to
15	retain power over Student Association decisions?
16	A. I don't know.
17	Q. Okay. Are you aware of any class
18	of decisions made by the Student Association which
19	the university has ever controlled, to your
20	knowledge?
21	A. I don't.
22	Q. Okay. And in particular, do you
23	have any knowledge that the University directed any
24	Student Association decision regarding the College

Republicans, Libertarians of the Laffer Event?

25

	Page 363
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I don't know.
3	Q. Okay. And also if we go to the
4	next page, we're still at paragraph forty, it talks
5	about the Student Association has the power to
6	suspend or reinstate Student Organizations.
7	A. Where are you reading this from?
8	Q. Sure. Page eleven, the first
9	A. Uh-huh.
10	Q sentence, which is a
11	continuation of paragraph forty.
12	A. Okay.
13	Q. And are you aware of situations
14	in which the Student Association can suspend or
15	reinstate student organizations?
16	A. Not that I know of.
17	Q. Okay. And in terms of the
18	College Republicans, to your knowledge, following the
19	Laffer Event and the tabling event, was the College
20	Republicans charter revoked?
21	A. I don't know.
22	Q. Okay. And was any of their
23	financing either reclaimed or terminated or held up
24	because of that?
25	A. I don't know.

	Page 364
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Now, it's my understanding
3	that the Student Association provides funding to var
4	various chartered organizations? Well, let me ask
5	you this way.
6	A. Uh-huh.
7	Q. As a chartered organization
8	A. Uh-huh.
9	Q you have the ability to
10	request funds from the Student Association?
11	A. Yeah. I don't remember, but
12	Q. Okay.
13	A I don't remember.
14	Q. Okay. Do you recall if the
15	College Republicans ever received any money from the
16	Student Association while you were President?
17	A. I don't know if it was from the
18	Student Association of the five-hundred-dollar budget
19	
20	Q. Okay.
21	A that was quoted previously.
22	Q. And is that a budget that that
23	you prepared as a proposal to some entity to get the
24	five-hundred dollars?
25	A. Not that I know of.

	
	Page 365
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Do you know how the five-
3	hundred dollars found its way to the College
4	Republicans?
5	A. I don't.
6	Q. Okay. If the College Republicans
7	were to make an application to the Student
8	Association for funding, would that be something the
9	treasurer would handle or some other office on the
10	Executive Board?
11	A. I'm not completely sure.
12	Q. Which, to the best of your
13	knowledge, was your understanding?
14	A. To the best of my knowledge,
15	potentially the treasurer, but again, I'm not
16	completely sure.
17	Q. I understand. And and I'm not
18	trying to trap you with that. I just want your best
19	of your recollection.
20	A. Okay.
21	Q. Now, in terms of getting
22	permission to table. My understanding, and correct
23	me if I'm wrong, if an organization wants to table on

the spine, they need to get approval prior to that?

A. As far as I understand, correct.

24

25

1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. And that's done through
3	the Be There account?
4	A. I don't know what the process is.
5	Q. Okay. So you don't know whether
6	or not the request for tabling permission goes
7	through the University as opposed to the Student
8	Association?
9	A. I don't know.
10	Q. Okay. I'll ask you to look at
11	Exhibit Five, which were the reservation guidelines.
12	Now, do you know who generated these guidelines?
13	A. I do not know.
14	Q. Okay. And I'll direct your
15	attention to the top of the first page of Exhibit
16	Five, which lists a series of email addresses. Do
17	you see that?
18	A. I do. Are you talking under a
19	reservation guidelines?
20	Q. Reservation guidelines?
21	A. Okay.
22	Q. Maybe not email. I shouldn't
23	I'm sorry. This is getting my age, website
24	addresses.
25	A. They appear to be hyperlinks, but

	Page 367
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	
3	Q. Even better. Okay. Were there
4	any hyperlinks to the Student Association, or all of
5	these through the University?
6	A. I don't know.
7	Q. Okay. Well, you've seen before
8	you testified, to an email that was sent from the
9	Student Association and it had a particular hyperlink
10	to it. Do you see any hyperlink here which is to the
11	Student Association?
12	A. I don't know where these
13	hyperlinks go.
14	Q. Okay. All right. And in terms
15	of the guidelines, these apply not only to S.A.
16	chartered organizations, but to other groups, Greek
17	groups, faculty and staff?
18	A. I don't know.
19	Q. Well, I'll I'll I'll ask
20	you to look at under reservation guidelines on the
21	first page.
22.	A. Okay. According to the document,
23	it does say that.
24	Q. Okay. So would it be fair to say
25	that if groups other than an S.A. organization wanted

Page 368

1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	to reserve a group through the Be There account, they
3	would not be going through the Student Association?
4	A. I can you
5	Q. Sure
6	A I'm having a little trouble -
7	_
8	Q I'll rephrase that.
9	A understanding.
10	Q. Yeah. Okay. With respect to who
11	approves the requests for reservations, if there were
12	non S.A. student groups that can apply, would it be
13	fair to say that S.A. wouldn't be the one making that
14	decision? If say, one of the Greek groups or faculty
15	or staff applied?
16	A. I don't know who does the
17	approval for that.
18	Q. Okay. And if you look under the
19	section, same thing of Exhibit Five, under on the
20	second page near the bottom, it talks about major
21	events. And if you go to the following page, it
22	should be the third page, they about meeting with
23	Orrin Kenyon, Assistant Director of Union Operations.
24	You see that?
25	A. Yes, I do see that.

	Page 369
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	Q. Okay. Do you know whether or not
3	Orrin Kenyon was an official with the Student
4	Association?
5	A. I do not.
6	Q. Okay. But Union Operations is an
7	administrative department?
8	A. I don't know.
9	Q. Okay. Now, in terms for the
10	the requests that were made for the room, for the
11	Laffer speech, we're moving out a little past of
12	tabling event.
13	A. Uh-huh.
14	Q. Do you know whether those were
15	made to the University union staff?
16	A. I don't know.
17	Q. Okay. Do you know who made the
18	request on behalf of the College Republicans for the
19	room for the Laffer speech?
20	A. If I remember correctly, I
21	believe it was sent from my email, if I remember
22	correctly.
23	Q. Okay. Yeah, and that's Exhibit
24	Three. And if you look at Exhibit Three, your email,
25	at least on page one, is addressed to

	Tage 570
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	classrooms@binghamton.edu. Do you see that?
3	A. I do from classroom account.
4	Q. Right. Now, do you know whether
5	that that's a hyperlink to an administrative
6	office or to an S.A. office?
7	A. That's just an email address, I
8	believe. I don't think that's a hyperlink.
9	Q. Okay. Is that to an
10	administrative office or to the Student Association?
11	A. I don't know.
12	Q. Okay. All right. I'll direct
13	you to paragraph forty-two of the complaint.
14	A. So Exhibit One?
15	Q. Yeah, Exhibit One.
16	A. Okay. Paragraph forty-two you
17	said?
18	Q. Right. And that deals with the
19	Y.A.F.?
20	A. What page is that on?
21	Q. Page eleven.
22	A. Okay.
23	Q. It references a problem that they
24	had with the anti-communism provision in the group's
25	constitution. Do see that?

	Page 371
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. I do. I'm just reading it over.
3	Q. Sure.
4	A. I do see that.
5	Q. Okay. And is it your
6	recollection that the Y.A.F. applied to be a student
7	student organization?
8	A. I do not know.
9	Q. Chartered?
10	A. I don't know.
11	Q. Okay. So you were you
12	involved in any conversations with the Y.A.F. about
13	an attempt to be a chartered organization on campus?
14	A. Not specifically for Y.A.F.? All
15	right, I'm a little confused
16	Q. Yeah, sure.
17	A specifically for a Young
18	America's Foundation chapter on campus?
19	Q. Young Americans for Freedom is my
20	understanding what Y.A.F. is.
21	A. No, it's Young America's
22	Foundation.
23	Q. Okay. This paragraph well,
24	paragraph forty-two talks about not granting official
25	recognition to Young Americans for Freedom. So let

	Page 372
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	me start with that. Do you know, does the term Young
3	Americans for Freedom have any meaning to you?
4	A. No.
5	Q. Okay. So when you refer to the
6	Y.A.F., you're referencing Young Americans
7	A. Foundation.
8	Q. Foundation, okay. And do you
9	know whether or not in the fall semester of 2019,
10	whether the Young Americans Foundation applied to be
11	a chartered student organization?
12	A. I don't know.
13	Q. Okay. So you wouldn't have been
14	involved in anything relating to such an application?
15	A. Not that I know of.
16	Q. Okay. And so in terms of
17	paragraph forty-three, where they talk about the
18	Student Association approving the language, but then
19	raising requirements for a faculty advisor and more
2.0	sponsor and police presence, were you involved in any
21	of those discussions?
22	A. I don't know what Young Americans
23	for Freedom is.
24	Q. Okay. I'm sorry. Again, when

I'm using Young Americans for Freedom, we'll take

25

	Page 373
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	that for now to mean Young Americans Foundation.
3	A. Okay.
4	Q. And are you aware of the Student
5	Association telling the Young Americans Foundation
6	that they either needed a faculty sponsor or police
7	presence at their events in order to be a chartered
8	group?
9	A. I'm not aware.
10	Q. Okay. If I'll refer you then
11	to paragraph fifty-seven.
12	A. Okay.
13	Q. And that references a free speech
14	suppression policy of Defendants Stenger, Rose and
15	Pelletier. First of all, can you can you describe
16	what the spree this speech suppression policy
17	refers to?
18	A. I can't. I don't know.
19	Q. Okay. Okay. And do you have any
20	knowledge whether or not the Student Association
21	either generated or had input into what's called the
22	speech suppression policy, or Defendants Stenger,
23	Rose and Pelletier?
24	A. I don't know.
25	Q. Okay. I'll then direct your

	Page 374
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	attention to paragraph seventy. And it talks about
3	Y.A.F., and again, your understanding is Y.A.F. is?
4	A. Young America's Foundation.
5	Q. Foundation. Okay. Talking about
6	speaking with counsel for the University. Do you
7	have any knowledge about that conversation?
8	A. I do not.
9	Q. Okay. And it'd be fair to say
10	then that you don't know whether or not the Y.A.F.
11	spoke to any S.A. official regarding the Laffer
12	event?
13	A. I spoke to any S.A. official?
14	Q. Right, if
15	A. Not that I know of.
16	Q. Okay. All right. Then I'll ask
17	you to look at the paragraphs seventy-seven through,
18	I believe, it's ninety-seven, which really focuses on
19	the disruption of the Laffer speech. And I guess
20	I'll ask, are you aware of any S.A. involvement in
21	facilitation of the disruption of that event as
22	alleged in the complaint?
23	A. Not that I know of.
24	Q. Okay. And are you aware of any
25	conduct of the S.A. which you feel led to the

	Page 375
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	disruption or assisted the disruption of the Laffer
3	Speech?
4	A. I don't know.
5	Q. Okay. And same with the
6	cancellation of the speech. Do you have any
7	knowledge that anybody at the S.A. had any role in
8	canceling as alleged the Laffer Speech?
9	A. I don't know.
10	Q. Okay. Now, we'll go to the
11	second cause of action, which is on page thirty-two
12	at the bottom and carries over to page thirty-three.
13	And in particular, paragraph one fifty-eight alleges
14	that the Student Association knowingly and
15	intentionally used State power to retaliate against
16	the College Republicans for the views they expressed
17	during your tabling and Dr. Laffer event. Do you see
18	that paragraph?
19	A. I do.
20	Q. Okay. Are you aware of any
21	actions that the Student Association took to
22	retaliate against the College Republicans?
23	A. They canceled the room, booking
24	rooms and meeting.
25	Q. Okay. The Be There account?

	Page 376
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Correct.
3	Q. Okay. And we looked at the email
4	from the Student Association that indicated that that
5	action was taken because of the violation or because
6	of a violation by the College Republicans of the
7	tabling procedure getting prior approval. Do you
8	recall that email?
9	A. I recall the email.
10	Q. Okay. Do you have any basis to
11	believe that that was not why they suspended the Be
12	There account?
13	A. I don't know.
14	Q. Okay. And in in terms of do
15	you have any direct knowledge that that particular
16	act of suspending the Be There account for the
17	College Republicans was done in retaliation for their
18	political for Republican's political views?
19	A. I don't know.
20	Q. Okay. All right. So go to
21	paragraph one sixty then.
22	A. Okay.
23	Q. It alleges that the Student
24	Association's retaliation against College
25	Republicans, express views, was part of a pattern of

	Page 377
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	discriminatory behavior as evidenced by its prior
3	attempts to block the expression of other
4	conservative groups, like the Young Americans for
5	Freedom. So let me start with that.
6	Are you aware of any groups other than
7	the Young Americans for Freedom that were subject to
8	actions on the part of the S.A. which you claim are
9	part of the pattern of discriminatory behavior?
10	A. To the best of my recollection, I
11	know the Student Association had issues with the
12	Binghamton review, the free speech paper on campus
13	Q. Okay.
14	A in past years.
15	Q. And when you say past years, do
16	you have any conception of how far past we're talking
17	about?
18	A. Maybe
19	Q. How long ago is if you recall?
20	A. I don't recall.
21	Q. Okay. More than five years
22	before the Laffer incident?
23	A. I would say around five years.
24	Q. Okay. And in terms of the issues
25	first of all, you said Binghamton Review, is that?

	Page 378
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2 · .	A. Correct. The Binghamton Review.
3	Q. Okay. Is that a publication that
4	you would characterize as a conservative publication?
5	A. I characterize it as a right
6	leaning free speech publication.
7	Q. Okay. All right. And in terms
8	of the issues that the Student Association had with
9	the Binghamton review, do you recall what those were?
10	A. If I remember correctly, there
11	was a big controversy over an article that was
12	published in the Binghamton review a number of years
13	before I
14	Q. Okay. And do you remember what
15	the article was about?
16	A. I if I remember, it was about
17	a documentary. If I remember, a student wrote up a
18	piece about a documentary if I remember correctly.
19	Q. Okay. And do you recall what
20	issue the Student Association had with that article?
21	A. I wasn't around during that time.
22	Q. Okay. All right. And and
23	then what makes you believe that the problems they
24	had with the review regarding that article was due to
25	the reviews political views?

	Page 379
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. If I remember correctly, the
3	article was a pretty conservative piece. I never
4	read it. But I remember hearing from students from
5	past years talking about it.
6	Q. And what did they say about what
7	they thought was behind the University's concern or
8	the Student Association's concerns with the article?
9	A. They said that it was, if I
10	remember correctly, homophobic, if I remember
11	correctly, but again I wasn't there
12	Q. Okay.
13	A so I don't specifically know.
14	Q. Okay. Are you aware of any other
15	actions by the Student Association which make up the
16	pattern of discriminatory behavior alleged in
17	paragraph one sixty, other than what you've just
18	testified to?
19	A. I don't know.
20	Q. Okay. Those are all the
21	questions I have. Thank you.
22	REDIRECT EXAMINATION
23	BY MR. MOORE:
24	Q. A quick follow-up, staying on the
25	same page.

	Page 380
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Okay.
3	Q. Paragraph one fifty-eight says,
4	"Based upon the allegation set above, Defendants
5	Stinger, Rose and Student Associations knowingly and
6	intentionally use State power to retaliate against
7	College Republicans for the views they expressed
8	during their tabling and Dr. Laffer event."
9	Can you tell me how you if you
10	know, how Defendant Stenger knowingly and
11	intentionally retaliated against the College
12	Republicans?
13	A. I don't know.
14	Q. And do you have any knowledge of
15	how Defendant Rose knowingly and intentionally used
16	State power to retaliate against College Republicans?
17	A. I do not know.
18	Q. Okay. And again, you don't know
19	whether Stenger and/or Rose were involved in the
20	decision to suspend the Be There account?
21	A. I I'm not either of them, I
22	can't answer for them. I don't know.
23	Q. Okay. I'm asking what you know.
24	Was there did Laffer have any other events that
25	day on November 18, 2019, on that day in Binghamton?

800.523.7887

	Page 381
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	A. Yes. I he had a press
3	conference I've mentioned earlier.
4	Q. Right. Anything other than that?
5	A. Well, lunch with us, and other
6	than that, I don't know.
7	Q. Lunch with you, press conference
8	
9	A. Other than that?
10	Q and then the speech? Is that
11	it?
12	A. As far as I know.
13	Q. Okay. All right. That's all I
14	have. Thanks for your time. Appreciate it.
15	THE REPORTER: Are we going off the
16	record?
17	MR. SAITTA: Off the record, yeah.
18	(The deposition concluded at 3:25
19	p.m.)
20	
21	
22	
23	
24	
25	

800.523.7887

```
Page 382
      B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
 1
 2
     STATE OF
     COUNTY OF
 3
                I, JOHN RESTUCCIA, have read the foregoing
     record of my testimony taken at the time and place noted
 4
     in the heading hereof and do hereby acknowledge:
 5
     (Please check one)
                ( ) That it is a true and correct transcript of
 6
     same.
                ( ) With the exceptions noted in the attached
     errata sheet, it is a true and correct transcript of same.
 7
 8
                                 Χ
                                  JOHN RESTUCCIA
 9
10
     Sworn to before me this
           _day of ____, 2023.
11
     NOTARY PUBLIC
12
     My Commission Expires:
13
14
15
16
17
18
19
20
21
22
23
24
25
```

	Page 383
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	I, NICOLE BUNNELL, do hereby certify that the
3	foregoing testimony of JOHN RESTUCCIA was taken by me, in
4	the cause, at the time and place, and in the presence of
5	counsel, as stated in the caption hereto, at Page 1
6	hereof; that before giving testimony said witness was duly
7	sworn to testify the truth, the whole truth and nothing
8	but the truth; that the foregoing typewritten
9	transcription, consisting of pages number 1 to 381,
10	inclusive, is a true record prepared by me and completed
11	by Associated Reporters Int'l., Inc. from materials
12	provided by me.
13	Nicole Burnell Nicole Bunnell, Reporter Bet
14	NICOLE BUNNELL, Reporter Bet
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

www.courtsteno.com

	Page 384
1	B.U. College, et al v Rose, et al - 1/10/23 - J. Restuccia
2	ASSOCIATED REPORTERS INTERNATIONAL, INC. (800) 523-7887
3	
4	Date: Case Name: B.U. College Republican's v Rose, et al
5	Index Number: 20-CV-0822 Deponent: John Restuccia
	Deposition Date: 1/10/2023
6	Examining Attorney: John Moore, A.A.G.
7	Dear Mr. Restuccia:
8	Please read and make any changes and/or corrections in
9	your testimony and sign the transcript in the presence of
10	a notary public. Please do so within thirty (30) days. If you fail to sign the transcript within thirty (30)
	days, it will be delivered to the appropriate parties
11	without signature. Return the transcript with corrections, if any, to:
12	OFFICE OF THE NEW YORK STATE ATTORNEY GENERAL
13	BY: JOHN MOORE, A.A.G.
14	AMANDA KURYLUK, A.A.G. The Capitol
15	Albany, New York 12224
	CORRECTIONS:
16	Word or phrase:
17	Corrected to:
18	Word or phrase:
19	Corrected to: Word or phrase:
	Corrected to:
20	Word or phrase:Corrected to:
21	Word or phrase:
22	Corrected to: Word or phrase:
	Corrected to:
23	Word or phrase:
24	Corrected to:
25 ARII @	Date Signed www.courtsteno.com
_	

```
Additionally 238:7
               Α
                                  address 3:10 10:7 13:12 29:19
A-N-085:8
                                   30:7 31:23 32:11 42:8,15 44:2
A.A125:25
                                   44:12,13,14 82:12 84:13,13
A.A.G2:10,11 384:6,13,13
                                   105:21,24 106:8,25 107:6,23
a.m1:19 7:3 100:8,9 103:6
                                   116:24 122:22 131:2,5,8,23,24
 104:12 134:5 146:8,9 174:19
                                   131:24 213:19,19,20 233:20
 178:21,25 181:10 191:4 217:21
                                   238:6,25 266:3 340:3 358:5
 235:16 238:12
                                   370:7
A.R246:5,9,14
                                  addressed 369:25
Aaron 339:12 340:19 342:8
                                  addresses 12:8 41:9 107:18,24
abilities 48:3
                                   130:24 213:15 232:17 366:16
ability 364:9
                                   366:24
able 94:22 103:14 109:4 215:2
                                  adequate 109:5
Absolutely 41:24 44:24
                                  adjacent 267:16 268:6,14 269:8
academic 128:16 236:7
                                   274:5
accept 155:7
                                  administration 252:20 259:14
access 43:8 44:3 111:25 177:23
                                   263:21 279:24 285:2,6 335:14
 213:22 231:6 233:3
                                   335:15,18 336:25 362:6,14
accessible 183:5 233:17
                                  administrative 135:22 369:7
accidentally 134:25
                                   370:5,10
accommodations 353:7
                                  administrator 128:23 129:4,13
account 105:17 113:10 133:22
                                   261:12 280:12,22
 148:13,13 158:12,20 340:14,23
                                  administrators 253:17 261:9,10
 341:2,4,18 342:2 345:22 346:4
                                   261:14 262:20 266:9 274:6
 346:10 350:14 351:25 366:3
                                  advance 269:17
 368:2 370:3 375:25 376:12,16
                                  advanced 220:5
 380:20
                                  advertise 309:2
accurate 23:24 46:17 217:6
                                  advertised 309:19
 288:24
                                  advertising 66:6
accusations 284:23 285:9
                                  advice 157:11
accused 285:5
                                  advise 151:19
achievements 283:5,5
                                  advised 236:9
achieves 48:7
                                  advisor 135:22 372:19
acknowledge 382:4
                                  Advisory 156:16,21
acronyms 90:18
                                  af 182:22
act 376:16
                                  affirm 7:6
acting 253:17 262:7,10,20,25
                                  afternoon 144:5 238:23
 297:13
                                  age 366:23
action 285:15 287:14,19 294:20
                                  agents 270:22 271:2,16,18
 336:21 345:20 346:2,8,19
                                   297:15 298:11,13 334:12 336:4
 375:11 376:5
                                  aggressive 224:3
actions 241:23 242:10 327:23
                                  ago 10:18 14:2 32:19 74:3 76:23
 375:21 377:8 379:15
                                   79:3 80:8 82:5 83:23 148:25
active 47:25
                                   149:7 377:19
actively 352:23
                                  agree 17:6 102:12 119:15 121:20
activism 169:21
                                   231:23 247:24 262:16 287:13
activities 48:9 64:14,15
                                   287:18 322:3,20 330:11
activity 352:22
                                  agreeing 155:7
actual 152:22
```

```
AGWAD 2:20
                                  164:1,1 165:1,1 166:1,1 167:1
ahead 12:22,23 49:6,7 174:22
                                  167:1 168:1,1 169:1,1 170:1,1
aid 47:22
                                  171:1,1 172:1,1 173:1,1 174:1
aides 269:24
                                  174:1 175:1,1 176:1,1 177:1,1
airport 269:25 270:3,5
                                  178:1,1 179:1,1 180:1,1 181:1
aisles 279:18 280:7
                                  181:1 182:1,1 183:1,1 184:1,1
Akshar 156:23
                                  185:1,1 186:1,1 187:1,1 188:1
al 1:1,1 2:1,1 3:1,1 4:1,1 5:1
                                  188:1 189:1,1 190:1,1 191:1,1
 5:1 6:1,1 7:1,1,25 8:1,1 9:1
                                  192:1,1 193:1,1 194:1,1 195:1
 9:1 10:1,1 11:1,1 12:1,1 13:1
                                  195:1 196:1,1 197:1,1 198:1,1
 13:1 14:1,1 15:1,1 16:1,1
                                  199:1,1 200:1,1 201:1,1 202:1
 17:1,1 18:1,1 19:1,1 20:1,1
                                  202:1 203:1,1 204:1,1 205:1,1
 21:1,1 22:1,1 23:1,1 24:1,1
                                  206:1,1 207:1,1 208:1,1 209:1
                                  209:1 210:1,1 211:1,1 212:1,1
 25:1,1 26:1,1 27:1,1 28:1,1
 29:1,1 30:1,1 31:1,1 32:1,1
                                  213:1,1 214:1,1 215:1,1 216:1
 33:1,1 34:1,1 35:1,1 36:1,1
                                  216:1 217:1,1 218:1,1 219:1,1
 37:1,1 38:1,1 39:1,1 40:1,1
                                  220:1,1 221:1,1 222:1,1 223:1
 41:1,1 42:1,1 43:1,1 44:1,1
                                  223:1 224:1,1 225:1,1 226:1,1
 45:1,1 46:1,1 47:1,1 48:1,1
                                  227:1,1 228:1,1 229:1,1 230:1
 49:1,1 50:1,1 51:1,1 52:1,1
                                  230:1 231:1,1 232:1,1 233:1,1
 53:1,1 54:1,1 55:1,1 56:1,1
                                  234:1,1 235:1,1 236:1,1 237:1
 57:1,1 58:1,1 59:1,1 60:1,1
                                  237:1 238:1,1 239:1,1 240:1,1
 61:1,1 62:1,1 63:1,1 64:1,1
                                  241:1,1 242:1,1 243:1,1 244:1
                                  244:1 245:1,1 246:1,1 247:1,1
 65:1,1 66:1,1 67:1,1 68:1,1
 69:1,1 70:1,1 71:1,1 72:1,1
                                  248:1,1 249:1,1 250:1,1 251:1
 73:1,1 74:1,1 75:1,1 76:1,1
                                  251:1 252:1,1 253:1,1 254:1,1
 77:1,1 78:1,1 79:1,1 80:1,1
                                  255:1,1 256:1,1 257:1,1 258:1
 81:1,1 82:1,1 83:1,1 84:1,1
                                  258:1 259:1,1 260:1,1 261:1,1
 85:1,1 86:1,1 87:1,1 88:1,1
                                  262:1,1 263:1,1 264:1,1 265:1
 89:1,1 90:1,1 91:1,1 92:1,1
                                  265:1 266:1,1 267:1,1 268:1,1
                                  269:1,1 270:1,1 271:1,1 272:1
 93:1,1 94:1,1 95:1,1 96:1,1
 97:1,1 98:1,1 99:1,1 100:1,1
                                  272:1 273:1,1 274:1,1 275:1,1
 101:1,1 102:1,1 103:1,1 104:1
                                  276:1,1 277:1,1 278:1,1 279:1
 104:1 105:1,1 106:1,1 107:1,1
                                  279:1 280:1,1 281:1,1 282:1,1
 108:1,1 109:1,1 110:1,1 111:1
                                  283:1,1 284:1,1 285:1,1 286:1
 111:1 112:1,1 113:1,1 114:1,1
                                  286:1 287:1,1 288:1,1 289:1,1
 115:1,1 116:1,1 117:1,1 118:1
                                  290:1,1 291:1,1 292:1,1 293:1
 118:1 119:1,1 120:1,1 121:1,1
                                  293:1 294:1,1 295:1,1 296:1,1
 122:1,1 123:1,1 124:1,1 125:1
                                  297:1,1 298:1,1 299:1,1 300:1
 125:1 126:1,1 127:1,1 128:1,1
                                  300:1 301:1,1 302:1,1 303:1,1
 129:1,1 130:1,1 131:1,1 132:1
                                  304:1,1 305:1,1 306:1,1 307:1
 132:1 133:1,1 134:1,1 135:1,1
                                  307:1 308:1,1 309:1,1 310:1,1
 136:1,1 137:1,1 138:1,1 139:1
                                  311:1,1 312:1,1 313:1,1 314:1
 139:1 140:1,1 141:1,1 142:1,1
                                  314:1 315:1,1 316:1,1 317:1,1
 143:1,1 144:1,1 145:1,1 146:1
                                  318:1,1 319:1,1 320:1,1 321:1
 146:1 147:1,1 148:1,1 149:1,1
                                  321:1 322:1,1 323:1,1 324:1,1
 150:1,1 151:1,1 152:1,1 153:1
                                  325:1,1 326:1,1 327:1,1 328:1
 153:1 154:1,1 155:1,1 156:1,1
                                  328:1 329:1,1 330:1,1 331:1,1
 157:1,1 158:1,1 159:1,1 160:1
                                  332:1,1 333:1,1 334:1,1 335:1
 160:1 161:1,1 162:1,1 163:1,1
                                  335:1 336:1,1 337:1,1 338:1,1
```

```
339:1,1 340:1,1 341:1,1 342:1
                                 ancient 182:5
 342:1 343:1,1 344:1,1 345:1,1
                                 and-a-half 26:3
 346:1,1 347:1,1 348:1,1 349:1
                                 and/or 70:22 71:15 107:19 119:7
 349:1 350:1,1 351:1,1 352:1,1
                                   121:12,14 276:10,24 284:22
 353:1,1 354:1,1 355:1,1 356:1
                                   286:2 294:19 295:16 308:24
 356:1 357:1,1 358:1,1 359:1,1
                                   380:19 384:8
 360:1,1 361:1,1 362:1,1 363:1
                                 anecdotally 73:9
 363:1 364:1,1 365:1,1 366:1,1
                                 angle 325:6
 367:1,1 368:1,1 369:1,1 370:1
                                 angles 314:5 318:3
 370:1 371:1,1 372:1,1 373:1,1
                                 Anne 72:23
 374:1,1 375:1,1 376:1,1 377:1
                                 announcement 279:16
 377:1 378:1,1 379:1,1 380:1,1
                                 answer 9:14 49:3,7 70:24 208:22
 381:1,1 382:1,1 383:1,1 384:1
                                   221:24 263:11 361:9,11 380:22
 384:1,4
                                 answered 49:3 62:22 70:24
                                   202:14 208:19 312:14
Albany 2:13 384:14
all-hands 266:25 267:2
                                 answering 9:3
Allam 359:15,17,21,22
                                 answers 6:9 8:21 9:7,9
Allegany 15:11
                                 anti-communism 370:24
allegation 61:14 380:4
                                 anticipating 166:25
allegations 11:3,7 16:12 17:7
                                 anybody 89:17 90:20 91:6 98:3
 23:23 81:11 83:8 85:16
                                   106:10 108:2 115:5 130:21
alleged 11:24 80:10,11 87:4
                                   145:21 162:5,11 219:3 227:3
 276:24 374:22 375:8 379:16
                                   229:20 250:24 252:11 258:4
alleges 119:14 375:13 376:23
                                   260:4 262:24 263:14 275:23
allow 151:16 243:20 266:15
                                   276:23 277:13 278:24 279:2
                                   290:22 291:13 300:12 303:20
allowed 53:7,9 55:7 87:14
                                   304:6 321:9,15 322:7,21 333:4
 129:15 305:24 311:12,13
                                   335:4,11,19 344:8 346:18
 347:19
allowing 236:3
                                   354:19 375:7
allows 362:14
                                 anymore 12:12
als 348:7
                                 anyway 31:12,17 51:17 164:16
                                   202:7 284:4
alternative 171:17
Amanda 2:11 300:16,16 327:20
                                 Apartment 12:10
                                 app 3:11 42:23
Amendment 192:25 220:17 221:16
                                 apparently 277:8
 221:21 269:4
                                 appeal 350:22
America 12:22,23,25 18:19
                                 appear 44:15 57:21 58:12,17
                                   109:22 116:12 133:10 230:14
 226:11
America's1:7 7:24 91:24,25
                                   231:24 325:13 359:10 366:25
 99:7 103:22 107:19 154:17
                                 appearance 56:24 60:7 109:13
 155:25 157:8,24 160:2 250:20
                                   145:5 237:22 248:10 275:17
                                   306:17 351:8
 254:25 289:15,23 371:18,21
 374:4
                                 appearances 2:2 176:12 306:6,6
American's 93:7 104:3
                                 appeared 55:10,16 57:11,24 58:3
Americans 56:19 90:14,16 371:19
                                   58:5,14 60:17 61:15,19 63:19
 371:25 372:3,6,10,22,25 373:2
                                   74:22 75:7,10 185:17 224:22
 373:5 377:4,7
                                   247:7,8 304:23 305:7,25 311:6
amount 93:21 94:13 157:8,9
                                   351:20,22
 183:13 240:24
                                 appears 103:8 116:16 120:5
                                   121:19 122:2 123:18 124:2
```

```
125:23 126:13 127:24 128:15
                                   145:23 176:9 236:8
 128:20,25 133:6,12,20,24
                                  article 378:11,15,20,24 379:3,8
 136:10 147:20 148:12,24 153:2
                                  articles 306:14
 153:5 157:25 158:5 165:2
                                  aside 132:8,10
 173:24 176:17 200:5 232:6,14
                                  asked 32:25 49:2 62:21 70:23
                                   73:17 77:2 149:15 202:13
 233:24 236:23 239:2,18,24
 240:7 244:22 245:21 246:4,19
                                   208:18 214:13 215:4,6,17
 248:24 279:7 321:6 324:7
                                   216:16 221:25 236:11 237:5,11
 329:3,5 337:18 338:2,16
                                   237:11 280:14 293:13 306:7
 339:12,21 344:16
                                   312:13 349:8
applaud 324:16
                                 asking 8:4,20 9:4 16:4 22:22,25
application 365:7 372:14
                                   23:2,13 24:8 43:11 62:25
applied 224:15 368:15 371:6
                                   70:25 89:12,12 149:15 150:3
 372:10
                                   150:15 192:16 209:7 215:14
apply 367:15 368:12
                                   236:5 241:9 263:16,18 280:6
appreciate 53:24 99:23 381:14
                                   305:3 320:21 332:13 342:7
                                   343:10 344:6,9 361:6 380:23
approach 272:3
approached 96:3 271:17 272:9
                                  assemblage 319:8
 326:7
                                  assembly 56:9
appropriate 384:10
                                 assist 47:24 103:14 155:8
                                   156:17
appropriately 157:16
approval 53:15,16,18 115:5
                                 assistance 16:23 215:17
 128:15 251:10 337:5 340:17
                                 Assistant 368:23
 347:10,19,24 349:2 365:24
                                 assisted 375:2
 368:17 376:7
                                 assisting 331:22
approve 110:18,21 234:6
                                 associated16:21 116:21 132:5
                                   167:3 169:13 170:4 383:11
approved 52:25 118:5,8 120:15
 122:4 123:24 125:22 127:18
                                   384:2
 128:23 129:4,13 210:22 351:25
                                 association 1:13 2:19 46:10
approves 368:11
                                   112:5,12 178:4 199:4,21
approving 60:6 118:11 372:18
                                   202:18 204:15 207:10 336:24
                                   337:4 339:16 340:16 347:9
approximate 27:8
approximately 26:2 46:11 168:18
                                   349:2 361:5 362:7,15,18,24
 178:21 180:21 212:11 220:22
                                   363:5,14 364:3,10,16,18 365:8
 270:21 278:7,13 315:21
                                   366:8 367:4,9,11 368:3 369:4
approximation 361:18
                                   370:10 372:18 373:5,20 375:14
April 314:19
                                   375:21 376:4 377:11 378:8,20
area 54:14 64:18 130:18 177:21
                                   379:15
 233:17,19 245:6 350:3
                                 association's 349:19 376:24
areas 233:15
                                   379:8
Arizona 10:17 12:7,11 14:3 95:4
                                 Associations 380:5
                                 assume 30:15 46:25 88:25 124:17
 307:5
armband 327:16
                                   128:5 133:17 137:23 154:16
arrested 286:22 287:13,17
                                   155:16 160:5 234:14 248:11
                                   263:4 297:22 311:25
arrived 178:20 186:10 190:24,25
 222:22 223:22 224:6,13,24
                                 assumed 27:16
 226:24 229:13,16 269:25
                                 assuming 247:17
Arthur 86:10 98:2 119:2,12,22
                                 assumption 138:2
 120:25 122:7 123:5 124:16
                                 Astov 52:5
 126:12,14 127:18,18 129:11
```

Page 389

```
207:24 208:21 219:21 234:4
ate 355:9
attached 134:15 135:18,24
                                  257:17 264:25 271:6,19 277:12
 136:10 137:25 382:6
                                  277:15 282:4 301:19 306:20
attachment 137:18
                                  334:7 348:25 349:10,12 351:19
attempt 341:22 371:13
                                  355:19 356:14,20 362:7,17
attempted 228:5
                                  363:13 373:4,9 374:20,24
attempting 326:3
                                  375:20 377:6 379:14
attempts 377:3
attend27:5 36:18 39:16 92:23
 109:5 130:6 141:20 168:4
                                 B4:2 44:13
 236:2 281:11,16
                                 B-A-Y 32:4
attendance 167:2 211:19 282:18
                                 B-L-A-K-E-S-L-E-E 81:4
attended 35:13 54:16 62:15
                                 B-R-I-N 40:2
 73:18,22 76:9 145:19 182:19
                                 B-R-Y-N 40:3
 352:11
                                 B.A205:14
                                 B.A.E 205:6, 11, 16, 17 206:9
attendee 90:3,5 212:13
                                 B.U1:1 2:1 3:1 4:1 5:1 6:1 7:1
attendees 89:14 168:16
                                  8:1 9:1 10:1 11:1 12:1 13:1
attending 106:24
attention 45:25 177:11 253:8
                                  14:1 15:1,23 16:1,2,20,22
 313:23 315:13 320:14 333:16
                                  17:1,6,23 18:1,8,23 19:1,15
                                  20:1,5,7,8,12,23,24 21:1 22:1
 361:23 366:15 374:2
                                  23:1 24:1,19,23 25:1,15 26:1
attorney 2:9 6:15 7:20 8:7 9:17
 9:20 22:24 29:25 40:9 135:9
                                  26:6 27:1,3,18 28:1,2 29:1
                                  30:1 31:1 32:1 33:1 34:1 35:1
 138:9 147:12 151:18 254:25
                                  36:1 37:1 38:1 39:1 40:1 41:1
 333:15,22 342:22 360:20 384:6
 384:12
                                  42:1 43:1 44:1,12,12,13 45:1
                                  46:1,18 47:1 48:1,21,24 49:1
attorneys 6:3 23:9 43:9 78:7
                                  50:1 51:1 52:1 53:1 54:1 55:1
 80:23 81:20,20 83:16 85:23
                                  56:1 57:1 58:1 59:1 60:1 61:1
 86:22 131:14 150:16 342:13
                                  62:1 63:1,14,15 64:1,23,24
 343:3,8,11,12 344:2,4,7,9
                                  65:1 66:1 67:1 68:1 69:1 70:1
 346:18
audibly 35:23
                                  70:5,12,21 71:1,12,14 72:1,9
                                  72:20 73:1,10 74:1 75:1 76:1
audience 319:13 321:16
                                  77:1,12,15 78:1 79:1,4,20,22
August 118:15 120:6
                                  80:1 81:1 82:1 83:1 84:1 85:1
author 285:3
                                  86:1 87:1 88:1 89:1 90:1 91:1
authored 250:6,8
                                  92:1 93:1,22,23 94:1 95:1
authoring 250:11
authorization 44:3,11 107:23
                                  96:1 97:1 98:1 99:1 100:1
                                  101:1 102:1 103:1 104:1,17
authorizations 45:6 132:3
                                  105:1 106:1 107:1 108:1 109:1
automatically 232:16
                                  110:1 111:1 112:1 113:1 114:1
available 50:2 111:20 115:4
                                  115:1 116:1 117:1 118:1 119:1
 266:15
                                  120:1 121:1 122:1 123:1 124:1
Avenue 2:6
                                  125:1 126:1 127:1 128:1 129:1
avoid 157:12
                                  130:1 131:1 132:1 133:1 134:1
aware 50:11 62:6,9 63:20 67:18
                                  135:1 136:1 137:1 138:1 139:1
 72:20,22 73:9,9 74:22 75:13
                                  140:1 141:1 142:1 143:1 144:1
 78:16 82:9 85:21 86:12 88:3
 89:10 91:5 107:2,9 114:4,10
                                  145:1 146:1 147:1 148:1 149:1
                                  150:1 151:1 152:1 153:1 154:1
 114:15,20 118:13 122:23
                                  154:5 155:1 156:1,5,16,20
 136:14 197:12,15 199:7 206:23
```

```
157:1,10 158:1,7,11,12 159:1
                                Baba 40:13 41:15
159:14 160:1 161:1,4 162:1
                                Babadina 40:14
163:1 164:1 165:1 166:1 167:1
                                back 10:18,25 14:3 15:12 17:23
168:1 169:1 170:1 171:1 172:1
                                 20:5 25:6 31:22 45:17 50:10
173:1 174:1 175:1 176:1 177:1
                                 75:16 91:20 119:19 132:13,18
178:1 179:1 180:1 181:1 182:1
                                 135:20 137:24 138:5 143:21
183:1,13 184:1 185:1 186:1
                                 149:22 160:13 164:10,13 169:4
187:1,9 188:1 189:1 190:1
                                 177:6 182:5 185:22 190:24
191:1 192:1 193:1 194:1 195:1
                                 194:18,25 223:22 232:19 243:5
196:1 197:1 198:1 199:1 200:1
                                 251:20 253:7 254:3,6 259:3
201:1 202:1 203:1 204:1 205:1
                                 272:14 312:25 321:3,3,12
206:1 207:1 208:1 209:1 210:1
                                 322:6,7 325:20 328:2,18
211:1 212:1 213:1 214:1 215:1
                                 329:10 330:8,13 331:10,20
216:1 217:1 218:1,12 219:1
                                 333:5,8,14 336:19
220:1 221:1 222:1 223:1 224:1
                                backed 288:6
                                background 338:16
225:1 226:1 227:1 228:1 229:1
230:1 231:1 232:1 233:1 234:1
                                backtrack 203:14
235:1 236:1,24 237:1 238:1
                                bad 248:15 267:6
239:1 240:1 241:1,23 242:1,2
                                balance 60:15
242:10 243:1 244:1 245:1
                                ball 51:22,22 301:5
246:1 247:1 248:1 249:1 250:1
                                ballpark 240:24
251:1,5 252:1,12 253:1 254:1
                                ballparked 240:15
255:1 256:1 257:1 258:1 259:1
                                Ballparking 241:2
260:1 261:1 262:1 263:1 264:1
                                bank 113:10 158:12,20
265:1 266:1 267:1 268:1 269:1
                                barrier 223:25 294:24 295:18
270:1 271:1 272:1 273:1 274:1
                                 296:20
                                Barry 94:20
275:1 276:1 277:1 278:1 279:1
280:1 281:1 282:1 283:1 284:1
                                base 89:6
285:1 286:1 287:1 288:1 289:1
                               based16:12 152:19 247:19
290:1 291:1 292:1 293:1 294:1
                                 248:10,21 320:24 322:23 380:4
294:7 295:1 296:1 297:1 298:1
                                basically 301:14
299:1 300:1 301:1 302:1 303:1
                                basis 347:14 362:7 376:10
304:1 305:1 306:1 307:1 308:1
                                Bate 102:11 116:13,15 117:22
309:1 310:1 311:1 312:1 313:1
                                 173:23 175:13 230:11 231:9
314:1 315:1 316:1 317:1 318:1
                                 249:20 337:21
319:1 320:1 321:1 322:1 323:1
                                Bates 120:7 121:19 123:11 125:7
324:1 325:1 326:1 327:1 328:1
                                 125:15 133:3 135:11 140:2
329:1 330:1 331:1 332:1 333:1
                                 146:18,20,21 147:5,11 148:7
334:1 335:1,4,11,13 336:1
                                 164:24 233:8 235:9 237:25
337:1 338:1 339:1 340:1 341:1
                                 243:14,15 244:9 342:20
342:1 343:1 344:1 345:1 346:1
                                bathroom 9:16
347:1 348:1 349:1 350:1 351:1
                                baton 360:20
351:17 352:1 353:1 354:1
                                Bay 32:3 52:7,8 74:11
355:1 356:1 357:1 358:1 359:1
                                beach 51:22
360:1 361:1 362:1 363:1 364:1
                                beard 317:24 321:23 324:2
365:1 366:1 367:1 368:1 369:1
                               began 24:20 43:17 200:24 221:12
370:1 371:1 372:1 373:1 374:1
                                 222:19 229:12 284:23 288:4
375:1 376:1 377:1 378:1 379:1
                                 290:9,15 295:4,5 297:25
380:1 381:1 382:1 383:1 384:1
                                beginning 25:11,13 29:15 134:2
384:4
                                 177:12 179:4 291:21
```

```
245:7,10 247:5,9 251:7 252:22
begins 324:18
begun 290:12,13
                                   257:4 262:5 263:19 272:6
behalf 231:7 251:13 304:23
                                   279:23 283:24 331:23 340:19
 305:8 369:18
                                   365:12,14,18 377:10
behavior 377:2,9 379:16
                                 better 163:18,21,25 164:5 367:3
behest 74:22
                                 bias 338:23
beings 248:11
                                 big 93:16 108:21 132:16 378:11
bel 201:4
                                 bigger 42:5 264:17
belief 23:22 347:8
                                 Binghamton 1:5, 13, 20, 22 2:14, 17
                                   2:18,23 15:21 18:13 21:22,22
believe 16:3 20:15,17 21:21
 32:23,24 33:3 39:25 40:14
                                   24:3,5 25:5,7 46:4,8,9,10
 42:2 46:24 55:22 60:2 65:6,13
                                   47:22 49:9 76:9 77:9 85:12,13
 67:12,25 68:17 69:6 70:17
                                   95:21 103:14 105:4 109:24
 76:20 79:21 82:20 91:10,14
                                   142:13,15 155:8 157:17 166:23
 92:6,9 99:5,13,15 103:16,21
                                   253:16 261:9,10 262:19 266:9
 113:15 115:7 119:9 122:12
                                   266:13 268:4 274:6 302:10,11
 125:3 136:23 137:6 140:24
                                   302:25 306:17 336:21,25
 142:12,13 144:10,14,25 145:24
                                   339:16,22 345:20 346:2,7
 148:16 149:10,24 151:5,7,10
                                   355:15 377:12,25 378:2,9,12
 155:20 157:4 159:12 161:14,20
                                   380:25
 162:15 163:11 168:23 169:3
                                 Binghamton's 177:22 279:10
 171:25 174:5 181:15 186:12,24
                                   356:23
 188:13 190:24 191:2 192:5
                                 Binghamton@sa.org 233:2
 196:6 199:14 200:2,12,16
                                 bipartisan 283:5
 201:7 202:22 203:13 205:4,10
                                 birth 10:5
 205:11,19 206:20 209:15,20
                                 Bishop 339:13 342:9
 210:11,19 214:11 215:10,14,20
                                 bit 24:6 98:16 135:11 162:25
 216:3 217:19,23 226:11,15
                                   163:17 254:4 360:18
 228:4,17 229:3 237:3,5 242:7
                                 black 261:23 316:25 317:3
 245:5 246:24 249:25 250:13,19
                                   321:23 324:2
 250:23 251:17 253:23 254:18
                                 blacked 340:7
 255:16 260:2 261:15 268:15
                                 Blakeslee 81:2
 269:2,7 270:24 271:9 272:20
                                 blamed 265:5
 275:9 276:3 279:14 282:2
                                 Blanski 33:3 38:9 46:24 74:11
 283:14 289:3,15 292:24 295:19
                                  81:3
 298:12 300:7 301:8,17 303:16
                                 block 300:5 377:3
 303:23 307:17 308:17 310:3
                                 blocked 339:22
 316:18 317:24 318:7,15,17,21
                                 blocking 177:23
 319:10,19,24 325:4 330:22
                                 blue 316:22 318:17,18
 338:19 342:10 359:15,23
                                 blueish 317:4
 369:21 370:8 374:18 376:11
                                 board 82:23 156:16,21 260:5
 378:23
                                   365:10
bell 88:2
                                 Bob 350:2,2
beneath 155:24
                                 Bobby 89:16, 18, 19 90:2 278:19
Bernhardson 54:15 55:11
                                   319:18 332:22
Bernstein 229:4 277:20,20
                                 Bobby's 89:23
 316:11
                                 Bonaventure 14:15,22 15:10,18
best 32:8 60:3 157:14 190:15
                                 book 47:7,10 87:9 201:5 269:18
 193:3 210:5 217:7 226:16
                                   341:5,9
 227:8 234:18 238:15 239:17
```

Page 392

```
booked 59:22 69:21 201:8 205:11
                                 calendar 74:4 129:14 170:16,24
 269:16
                                   170:25 171:9 172:21 173:7,14
booking 375:23
                                 California 92:9,9
books 356:9
                                 call 61:25 97:8 103:12,17 144:3
bottom 47:16 134:4,15 140:10
                                   151:3 163:10 185:16,18 186:13
 155:3 166:9,20 232:20 238:5
                                   214:13 215:5,9 223:2,12 224:8
 284:17 345:5 368:20 375:12
                                   326:20
box 238:8
                                 called 36:20 55:6 59:24 60:3,4
boyfriend 38:9
                                   77:5 87:18 134:16 144:5
                                   182:13 185:19 223:4,5 225:11
breach 289:9
break 9:14,15 15:25 17:13 23:16
                                   260:10 306:7 309:9 351:9
 23:17 99:23 100:6 146:4
                                   373:21
 234:23 242:22 270:11 300:15
                                 calling 216:22
 361:13
                                 calls 41:21 80:6 105:4 161:9
breath 333:23
                                   221:23 351:10
Breitbart 305:15 306:13
                                 camera 323:10
Brian 1:10 3:10 29:7,9 30:3,6
                                 camera's 318:16
 38:15 39:11,13 98:6 159:12,13
                                 camp 347:10
 159:16 160:22 170:14 172:18
                                 campus 5:5 18:23 19:18 35:2
 172:23 241:15 263:10 359:5
                                   36:14 47:22 48:11,25 51:5
Brian's 159:19
                                   57:11 60:20 61:12,18 62:7,16
brief 103:12,17 282:16 283:3
                                   63:9,16,21 64:14,16,18 65:18
bring 94:15 96:11,16,16,20
                                   66:20 69:5 70:22 71:15 72:21
 97:21,23 98:4 99:7 143:21
                                   72:23 73:11 74:22 82:2 85:14
 275:19,21,23
                                   87:11 88:6 89:12 92:14,21
bringing 94:4,7 99:3
                                   94:4,8,16,19 95:2 96:5,11,21
brining 94:19
                                   97:21,23 98:5 99:4,7 104:15
broken 227:23
                                   109:15,22 119:22 120:25
Broome 141:9,11,16 157:15 158:4
                                   128:14 135:23 169:21 171:18
 160:3
                                   174:20 177:22 179:17 187:7,9
brought 72:21,23 196:2
                                   192:20 205:2 206:24 223:24
Bryn 39:23 40:2 91:3 188:16
                                   227:10,17,19 236:12 254:15,19
 190:10,11,12 192:7 317:11
                                   256:3 301:15,20 302:19 307:16
budget 110:7 111:17 364:18,22
                                   309:15,17 332:6,7,14 338:17
building 51:3 233:16,17
                                   338:19,25 347:11,20,25 349:3
buildings 177:24 259:14
                                   350:24 351:6 356:23 357:10
Bunnell 1:24 383:2,14
                                   371:13,18 377:12
                                 campuses 66:20 92:14 99:11
business 92:21
busy 42:18 234:6
                                   176:13 187:5 192:21 338:23
buy 181:5
                                 canceled 273:17 346:23 375:23
                                 canceling 375:8
               C
                                 cancellation 375:6
c3:2 12:19 17:3
                                 candidate 57:4 96:9
C-H-R-I-S 55:21
                                 candidates 47:23
C-O-G-H-L-A-N 153:20
                                 capacity 190:4
C.C.'ed102:21 103:8
                                 Capitol 2:12 384:14
C.R 42:14 43:21
                                 caption 24:3 75:16,22 91:21
C.V8:2,2
                                   171:12 383:5
cabinet 308:11
                                 car 227:18 298:6
cache 308:15
```

```
cardboard 196:2 197:11
                                  chat 42:3 221:2
care 132:21
                                  chats 41:21
Carl 54:14 55:11,18 56:4,22
                                  check 38:4 53:25 62:3 83:23
 57:6,20
                                   157:7,9 310:7 351:10 382:5
carries 375:12
                                  checks 113:14 157:18
case 11:16 21:21,22 24:9 36:20
                                  Cheney 99:14,15
 49:5,10 58:6,10,12,13,14
                                  chief 85:11 161:4,10,13 171:7
 72:12 78:17 80:23 84:6,10
                                   173:12 254:18 255:20
 85:20,24 86:22 94:21 102:11
                                  children 13:16
 104:5 109:6 116:15 131:15
                                  chocolate 179:18 180:15,16,17
 133:4 163:2,3,6 167:11 174:24
                                   180:19,24 181:3,5 186:20
 214:6 219:15,25 249:19 309:5
                                   191:14,19 198:22 207:14
 309:9,22 313:14 384:4
                                   210:13 217:11,12
cash 113:13
                                  choice 193:8 195:24
catch 333:22
                                  choose 121:4
Caucasian 261:25 262:3
                                  chose 118:14 124:11,14 266:17
cause 6:16 336:21 345:19 375:11
                                  chosen 119:5 121:10
                                  Chris 28:11,12 54:15 55:20,21
caused 345:25 346:7 352:25
                                   55:24 56:4,23 57:6,23
cc'ed340:10
                                  Christmas 351:4
central 51:4 65:23
                                  circumstances 352:2
                                  civil 6:5 8:11,16
cents 353:4,13
certain 108:24 109:4 253:16
                                  claim 362:8 377:8
 261:8 262:19
                                  claims 85:20 104:5 268:2
certainly 222:3,4
                                  clarify24:6 335:6
certified 6:16
                                  class 181:16,17,18,19 182:3,9,9
certify 383:2
                                   182:11,20,23 183:9,12 184:11
chain 3:16 4:8,19 102:18,25
                                   184:14,18 185:4,23 186:12
 116:6 134:2 135:4,10 152:23
                                   190:20,25 191:4 192:2 198:5
 152:25 164:23 166:20 232:17
                                   218:15 219:2 221:7,10,13
                                   222:23,24 223:5,16 225:5,7
chains 43:2
challenge 156:17
                                   229:17 236:4 362:17
chance 174:20
                                  classes 18:16 182:2,6 183:13
change 108:15 138:23 263:22
                                  classroom 233:19 370:3
 264:16 265:14 267:13 353:25
                                  classrooms@binghamton.edu 370:2
changed 114:12 119:8 120:2
                                  clear 19:3 22:20 34:14 70:19
 121:12,15,17,17
                                   165:11 279:18 280:7 314:15,20
changes 384:8
                                  clearer 9:4,10 164:9
changing 236:14
                                  clerk 13:24
channel 55:6 87:15 306:9
                                  click 315:24
chanted 224:18
                                  close 78:24 178:21 194:16,17,19
chaotic 27:6 34:2
                                   195:3,5 196:16 197:4 217:5
chapter 371:18
                                   248:24 326:4
                                  closely 31:2
characterization 341:25
characterize 348:20 378:4,5
                                  closer 195:11,12 272:22,22
characterized 236:18
                                  cloth 261:4
charge 103:22 118:10
                                  clothes 168:5 169:4 261:4
                                  clothing 277:9 324:2
charter 363:20
                                 club 30:25 38:24 39:16 42:17
chartered 364:4,7 367:16 371:9
 371:13 372:11 373:7
                                   49:9,20,22,23 50:5,11,15,19
```

```
51:25 52:16 57:15 62:2,4
 77:11 91:13 92:20,22 98:7
 101:22 110:10,14 187:7,9
 200:11 202:24 203:3,6,8
 214:14 215:15 225:21 236:3
 250:9 332:17 351:10
clubs 50:2 52:15 53:6,7,9 187:6
 189:9 192:20 349:13
co-101:5
co-conspirators 274:3
co-sponsoring 104:17
coast 189:10
coat 89:6 151:14
code 12:11 179:12 279:10,19
 280:9,19,21 309:25
coffee 174:6,12,15 176:15
Coghlan 153:9, 10, 11, 13, 14, 20
 154:8 156:10,23
Coghlen 113:19 181:4 273:14
 332:20
Coghlen's 181:7
cold 245:6
colleague 358:9
collecting 150:14
collection 149:25 150:11
college 1:1,5,11 2:1 3:1 4:1
 5:1,2 6:1 7:1 8:1 9:1 10:1,25
 11:1,12,14,19 12:1,4 13:1
 14:1,8 15:1 16:1,7 17:1 18:1
 18:3,19 19:1 20:1 21:1,23
 22:1,23 23:1 24:1,4,5,16,19
 25:1,15 26:1 27:1,3,7 28:1
 29:1 30:1,25 31:1 32:1,21
 33:1,25 34:1 35:1,16 36:1,13
 36:25 37:1,4,10,15,22 38:1,2
 38:17,24 39:1 40:1 41:1,19
 42:1,5,7,9 43:1,12,14 44:1
 45:1 46:1,5,6 47:1,5,19 48:1
 48:6 49:1 50:1,7,12,15,20
 51:1,13,14,24 52:1,9,12,15,18
 52:20 53:1 54:1,4 55:1 56:1
 57:1,19 58:1,17 59:1 60:1,7
 60:14,23 61:1,6,23 62:1,7,16
 62:19 63:1,20 64:1,13 65:1
 66:1 67:1 68:1 69:1,4 70:1,19
 71:1 72:1 73:1 74:1,23 75:1
 76:1,4 77:1 78:1 79:1 80:1
 81:1,7 82:1,21 83:1 84:1 85:1
 86:1 87:1 88:1,11,17 89:1,14
 89:21,21 90:1,22 91:1 92:1
```

```
93:1,16,22 94:1 95:1,12,13
96:1 97:1,2 98:1 99:1,11
100:1,12,15,16,19,20,24 101:1
101:2,19 102:1 103:1 104:1
105:1,4,9 106:1,23 107:1,20
108:1 109:1 110:1,5 111:1
112:1 113:1 114:1,13 115:1
116:1 117:1 118:1 119:1 120:1
121:1 122:1 123:1 124:1 125:1
126:1 127:1 128:1 129:1 130:1
130:25 131:1,23 132:1 133:1
134:1 135:1 136:1,21,22,23
137:1 138:1 139:1,3 140:1
141:1,9,11,17 142:1 143:1
144:1 145:1 146:1 147:1 148:1
149:1 150:1 151:1 152:1 153:1
154:1,14 155:1,9 156:1 157:1
157:10,17 158:1,20 159:1,5
160:1 161:1 162:1 163:1 164:1
165:1 166:1,23 167:1 168:1,20
169:1 170:1 171:1,14,16,18,23
172:1,14,15,20 173:1,6,13
174:1 175:1 176:1,13 177:1,20
177:22 178:1,3,20 179:1 180:1
181:1 182:1 183:1 184:1 185:1
186:1 187:1,19,23 188:1,12
189:1 190:1,4,9 191:1,5,23
192:1 193:1 194:1 195:1 196:1
196:19 197:1 198:1 199:1,19
200:1,15,22 201:1 202:1,17,19
202:23,24 203:1 204:1,7 205:1
205:5,22 206:1 207:1,9 208:1
208:7,15,23 209:1,2,8 210:1,7
210:9 211:1 212:1,22 213:1,2
213:18,22 214:1 215:1 216:1
217:1 218:1 219:1 220:1,23,23
220:25 221:1,11 222:1 223:1
224:1,14,17,17,25 225:1,24
226:1 227:1,15,25 228:1,5,23
229:1 230:1,15,15 231:1,2
232:1,11,21 233:1 234:1 235:1
236:1 237:1 238:1,17 239:1,25
240:1 241:1 242:1 243:1 244:1
245:1 246:1 247:1,6,18 248:1
249:1 250:1,12,25 251:1,5,13
251:15 252:1,12,18 253:1,15
254:1 255:1 256:1 257:1 258:1
258:6 259:1,17,17,19 260:1
261:1 262:1,18 263:1 264:1,23
265:1,2,5 266:1,10 267:1,15
```

```
268:1,5,13 269:1 270:1 271:1
                                 coming 61:12 69:7 209:22 212:13
                                 comma 127:19,19 134:7
 271:7 272:1 273:1 274:1,2,5
 274:10 275:1 276:1,5,10,18,24
                                 commenced 7:2
 277:1,5,14,17 278:1,2 279:1,8
                                 comment 305:15
 280:1 281:1,16 282:1,3,15
                                 commentary 358:14
 283:1 284:1,21 285:1 286:1,2
                                 commentator 55:3
 286:11 287:1 288:1,18 289:1
                                 Commission 382:12
 290:1 291:1,13 292:1 293:1,20
                                 commitment 157:7
                                 committee 56:2 157:15 158:4
 294:1,8,18,23 295:1,16 296:1
 296:6,13 297:1 298:1,24 299:1
                                   160:3
 299:3,16,22 300:1,24 301:1,24
                                 common 255:16
 302:1,4,8,21 303:1,5,7,10,14
                                 commotion 185:24
                                 communicate 29:17 41:18,21
 303:15,24 304:1,24 305:1,3,8
 306:1,18 307:1,7,15,23,25
                                   212:25
                                 communicated 213:5,7
 308:1,2,3,14 309:1 310:1
 311:1 312:1 313:1 314:1 315:1
                                 communication 38:14 93:11
 316:1 317:1 318:1 319:1 320:1
                                   170:15,23 171:8 172:19 173:5
 321:1 322:1 323:1,2 324:1,20
                                   210:7
 325:1,9 326:1 327:1 328:1
                                 communications 22:23 37:14,20
 329:1,8 330:1 331:1,6 332:1
                                   43:12 214:2 258:21
 332:24 333:1,5 334:1 335:1
                                 communities 233:18
 336:1,6,7,22 337:1,2 338:1
                                 community 12:18,24 13:5 47:22
 339:1,19 340:1,3,14 341:1,6
                                   48:5 130:18 168:21 169:20
 342:1,3 343:1,7,17,19 344:1
                                 complaint 4:6 11:3, 4, 6, 8, 8, 9, 19
                                   11:24 16:12 17:7 21:13 22:5
 345:1,20,21 346:1,2,3,8,9,18
 347:1 348:1,3,8 349:1,17,19
                                   45:18 61:15 63:8 65:2 69:9,11
 349:24 350:1,6,10,14,18 351:1
                                   80:10,12 81:11 83:8 85:16
 351:7,16 352:1,5 353:1,18
                                   87:4 119:14 177:7,13,14 184:4
 354:1 355:1 356:1,8,13 357:1
                                   198:24 253:8 259:5 268:2
 357:3,10 358:1 359:1,24 360:1
                                   269:21 270:7,17 297:12 312:25
 360:2 361:1 362:1,24 363:1,18
                                   333:15,17 337:10 347:4 361:24
 363:19 364:1,15 365:1,3,6
                                   370:13 374:22
 366:1 367:1 368:1 369:1,18
                                 complaints 23:23
 370:1 371:1 372:1 373:1 374:1
                                 complete 135:18 137:4 208:22
 375:1,16,22 376:1,6,17,24
                                 completed 135:23 136:12,15
 377:1 378:1 379:1 380:1,7,11
                                   137:15,16 138:19 139:2 383:10
 380:16 381:1 382:1 383:1
                                 completely 118:24 365:11,16
 384:1,4
                                 concede 137:20
colon 127:18 153:8
                                 concentrate 329:7
colored 5:17 244:11,11
                                 concentrating 327:22
                                 conception 377:16
Colter 12:10 13:8
                                 concern 168:2 219:15 379:7
come 49:25 82:2 95:2,25 97:22
 99:2 111:2 114:12 209:17
                                 concerned 161:23 163:4 220:15
 212:15 215:2 222:5 239:24
                                 concerning 311:14
 255:13 268:25 281:18 290:11
                                 concerns 161:22 176:12 255:5
 290:22 328:24 338:25 339:5
                                   264:16 265:13 379:8
 353:18
                                 concluded 157:14 381:18
comes 40:20 187:5
                                 conclusion 148:18 221:24
comfortably 109:8
                                 conditions 266:11
```

```
conduct 357:5 374:25
                                   345:11 358:15
                                 contact 3:12 29:8,11 31:4 32:16
conducting 342:3
conference 18:13 92:24 144:6,13
                                   38:2,6 55:13 81:23 83:21 86:3
 144:15,18,20,21 145:5,15,17
                                   86:7,25 87:7,20,21 89:24
 381:3,7
                                   91:17 93:10 94:3 95:18,19
conferring 207:4
                                   96:2 97:5 98:12 99:2,10 104:8
confident 34:15
                                   104:11 107:18 108:5 110:4
confirm 163:21 238:7 241:10
                                   111:19 130:20 150:6 159:19
confirmation 66:7 232:22 234:11
                                   160:17,21,24 161:3,8,10,12,17
confront 221:9
                                   162:5,10,14 163:12 170:15,23
confronted 220:23
                                   171:8 172:19 173:5,12 209:20
confused 90:19 137:12 305:2
                                   214:12 216:17,20,21 218:11
 339:4 345:10 371:15
                                   219:3 222:18,22 229:20,23,25
confusing 166:16
                                   230:5 274:24 343:4 344:7,10
Congress 96:9
                                   357:5
congressional 57:4 96:9 352:11
                                 contacted 75:4 111:24 343:8
Congressman 61:9,15 352:9
                                 contacts 96:19 98:18,19 104:19
connecting 268:7
                                   104:23,25 105:2,13 106:3,9,16
connections 96:13
                                   106:22 258:3
consent 44:10 271:20
                                 contemplate 94:19
                                 contemplated 204:6
conservative 24:17 55:3 57:5
 192:25 193:2 348:9,13 377:4
                                 contend 262:10
 378:4 379:3
                                 content 245:13 251:10 280:17
considered 39:16 108:12
                                   284:7
considering 343:24
                                 contention 262:13 347:15
consistent 34:5
                                 contents 220:24 283:12
consisting 383:9
                                 context 46:15 73:12 76:24 90:8
conspire 357:2
                                   116:16 129:19 130:4,8 304:14
constitution 65:7,8,10,15 66:3
                                 continuation 363:11
 68:25 69:5,19,21 203:2,3,8,10
                                 continue 285:11 300:4
 203:18,20 300:20 301:9,11
                                 contract 135:20 136:7,12 137:2
 370:25
                                   137:5,7,12,17,21 138:5,15
                                   143:10,14,21 160:9,10
constitutional 271:21 336:24
 352:21
                                 contracted 135:19
constitutions 301:9
                                 contractor 205:15
consult 60:10 98:3
                                 contributions 356:9
Cont'q19:13 21:18 22:19 30:8
                                 controlled 336:25 362:19
 33:15 34:16 41:5,14 45:16
                                 controversy 378:11
 49:12 54:2,21 63:4 71:7 82:15
                                 convenience 99:21
 84:24 85:9 89:8 100:10 102:16
                                 conversation 76:25 77:3 83:24
 116:11 132:11 133:9 139:15
                                   83:25 84:9 150:8 255:23 292:6
 146:11 147:10 150:4 151:2
                                   292:7 312:3,7 374:7
 152:17 153:21 159:23 164:4,17
                                 conversations 23:14 225:15
 165:13 166:17 202:15 208:20
                                   227:15 275:16 284:11 293:4
 218:23 222:7 231:22 235:5
                                   331:12,21 343:11 371:12
 244:18 249:12 251:23 254:11
                                 convinced 273:12
 262:15 270:15 286:9 293:17
                                 coordinate 209:8 254:24
 299:14 300:19 308:25 310:10
                                 coordinated 209:14
 312:15 313:7,21 316:4 327:21
                                 coordination 214:9
 328:7,13 333:25 338:14 345:4
```

```
copied 232:16 344:13,14 345:16
                                  252:9 253:20 254:9 257:7
copies 43:8 151:9 310:6
                                  258:15,16,18,19 259:2 263:14
copy 6:16 21:7,12 43:12 132:25
                                  266:19 268:11 273:19 274:12
                                  274:18 278:23 281:6,13 282:24
 139:21 146:24,24 160:12
 163:18,22 186:5 232:15 244:11
                                  283:23 285:18 287:2 288:22
 249:6,9 283:15,17 284:3
                                  291:4 295:2,14 300:22 302:19
 337:25
                                  303:6,8 304:4 306:10,11
                                  307:20 309:6,7,13 310:24,25
copying 147:9
Cornell 91:14,15 99:14 229:5
                                  311:3,4,8,9,17 316:21,23,24
 281:16 282:3
                                  318:9,20 319:3,4,14 321:4,5,7
corner 247:3,13
                                  321:8 322:8 323:4,15,16,21,22
corporate 192:17
                                  324:2,3,8,9,12,13,16,17,23
correct8:12,13 11:12,22 16:3
                                  325:3,10,14,24,25 326:5,8,15
                                  326:18,21,24 327:4,12,13,15
 16:13 18:20 24:9,10 25:8,9
 26:18 32:7 33:17 39:9 47:13
                                  327:24 328:16,17,24 330:13
 47:14 49:19 52:10,11 53:2
                                  331:7,8 333:9 337:8 339:10,11
 59:3,4 60:18,19,24,25 61:4
                                  339:17,18 340:4,21,24 341:7
                                  341:12,13,15,16,19 342:5,6
 64:21 67:24 68:16 71:20 72:7
 72:8,10,11,13,14 75:2,3,6,8,9
                                  343:2,17,18 344:4 347:13
 75:11,12 77:24,25 79:16 81:5
                                  349:22 350:25 351:2,4,5,8,18
 86:13,14,18,19 93:22 94:24
                                  351:21,22 352:13 353:10 357:8
 95:16,23,24 110:16 112:12,13
                                  357:18,19 365:22,25 376:2
 113:5 118:12,15,16,18,19
                                  378:2 382:5,7
 119:3,4 120:8,9 122:5,17,18
                                 Corrected 384:17, 18, 19, 20, 21, 22
 122:25 123:3,4,14,15,16,18,25
                                  384:23
 124:4,5,20,21,24 125:16,17,19
                                 corrections 6:11 384:8,11,15
 125:20,22 126:3,4,17,20 127:2
                                 correctly 46:12 48:13 53:5
 127:3 128:3,8,9,19 130:13,14
                                  58:20 64:20 92:20 97:3 100:22
 131:2,3,5,6 133:10,12 134:6
                                  105:3 109:19 110:17 111:16
 134:12,19,20 135:6,7 136:4
                                  112:3 129:16 134:11 136:3
 137:13,14,22 139:8 140:8,12
                                  140:20 155:11 156:6,22 157:20
 140:13,21 142:4 144:9 145:19
                                  159:7 161:21 167:7,25 168:24
 148:25 149:2 152:21 153:3
                                  178:5 181:5 186:14,19 191:13
 154:3,12 155:12,22,23 156:7
                                  206:15 221:3 224:19 227:22
 157:21,24 158:4,8 162:2 163:8
                                  228:14 231:7 236:16,19 253:19
 166:2,21 167:8 175:20 176:3
                                  255:2 260:8 265:8 266:18
 178:6,11,12 180:11,12,14
                                  268:10,23 272:13 273:6,18
 181:9,12 183:7,18 184:5,6,9
                                  274:11,20,23 275:4 276:18
 184:22 195:2 196:19 199:5,6
                                  279:13 280:13 281:12,20
 199:17,21,22 200:4,8,20,24
                                  282:23 285:17 287:7,23 288:21
 201:16,17,19,20 203:16 204:24
                                  294:25 296:4 297:16 305:14,21
 207:20,21 208:24 211:6,7,25
                                  307:4 310:4,14,18 334:13
 212:17 214:22 218:2,3 219:16
                                  335:25 337:7 340:20 341:4
 219:17 221:4 223:4,17 224:7,9
                                  342:14 347:12 348:4 349:21
 224:10,20,22,23 225:3 228:12
                                  352:12 353:9 357:7 359:14
 231:12 232:2 233:12,13 234:2
                                  369:20,22 378:10,18 379:2,10
 235:13,14,21,22 236:17 237:12
                                  379:11
 237:15,16,18,19,22,23 238:12
                                 correspond 33:13
 238:13 239:4,5 240:6,22
                                 Coulter 72:23
 243:11,12,23 244:3 248:5,22
```

```
counsel 22:18 23:14 102:12
                                 current10:7 31:4 32:10,13,21
 127:10 150:13,25 151:18
                                   37:15 38:7 46:20,22 47:2
 163:21 203:15 343:25 374:6
                                   61:13 77:12 79:4,20 81:7
 383:5
                                  83:21 86:7 87:21 89:24
country 92:14
                                 currently 13:18 14:4 46:18
county 56:2 141:16 157:15 158:4
                                   56:20 81:23 86:3,24 104:8
 160:3 382:2
                                  238:18 351:17
couple 74:3 96:14 112:25 131:8
                                 Curve 236:8
 163:3 248:13 332:12,18 352:20
                                 cut146:18 326:12,13
course 9:13 19:4 21:9 86:17
                                 cutout 186:22 196:2 197:7,11
 322:15 344:13
                                 cutouts 186:23
COURT 1:2
                                 cutting 326:12
cover 22:2
covered 70:18
covering 109:25
                                 D3:2,2 4:2
                                 D-Z-E-I-C 55:22
COVID 18:16,21 19:21
COVID-19 19:20
                                 D.B.U250:24
                                 D.C2:7 16:19 17:3 19:6,8 73:14
CRAIG2:5 19:3,5 21:7 22:17
                                  306:25 307:6 360:13
 32:23 33:2,6,8,10,13 34:14
 40:19,24 41:2,11 43:20,24
                                 D.C.'s 25:21
                                 D.M.V13:22,25 23:18
 44:4,7,16,19,22,25 45:3,11
 49:2,6 53:25 62:21 70:23 71:4
                                 Daily 305:22
 82:14 84:18,20 88:25 89:4,7
                                 damages 353:2
 99:21,25 100:4 102:13 116:4
                                 Dan 156:23
                                 dark-321:21
 116:10 131:21,25 132:4,8,21
                                 dark-skinned 323:25
 146:20,22 147:2,5 149:24
 150:10,19,23 151:15,20,24
                                 dash 118:21,21 120:11,11 121:5
 152:4,9,11,14 159:20 163:24
                                   121:5,25,25 124:4,4 125:25,25
 164:14 165:5,9 166:6,9 202:13
                                 date1:18 10:5 44:18 58:6 65:15
 208:18 218:18,22 221:23
                                  70:9 108:8,15,15 109:12
                                  118:18 119:7,25 120:6,21
 231:14,19 234:25 242:25
                                  121:9,12,14,17 122:10 124:23
 244:13 249:7,11 254:10 262:12
                                  124:25 125:12,14,15,18 126:16
 263:15 286:5 293:10,15 299:12
                                   126:18 152:6 164:20,22 174:23
 308:21 310:7 312:13,24 313:4
 314:12,16,25 315:18 328:9
                                  175:2 178:4 187:17 199:21
 338:4,7,9,12 345:3
                                  202:19 207:10,11 231:25 245:4
                                  360:7 384:3,5,25
crash 169:22
                                 dated 103:5 118:15 133:7 173:25
created 210:24
                                  235:16 314:5
creating 223:24
                                 dates 16:6 25:2 108:15 256:21
credit 236:25
                                 daughter 56:8
credits 16:21 236:2
                                 Dava 171:25 172:6,7,8 276:19
Crime 182:12,14 185:12
                                   295:19 323:6
Cross 3:5
CROSS-EXAMINATION 361:2
                                 day 49:9,21,22 50:11,15,19
                                   51:25 53:5 58:9 65:7,8,10,15
crossover 52:15 100:23
                                  66:3 68:25 69:5,19,21 102:9
crowd 279:10 280:15 281:9 288:7
 288:9
                                  119:12 175:4 180:11 197:13,17
cups 186:21
                                  203:2,4,9,10,18,20 208:8
                                  209:18,18 226:20,23 229:21
cur 83:20
                                  240:10 246:22 253:14 256:24
```

```
262:17 273:14 284:12 285:7
                                   369:7
 289:20 300:20 301:2,4,9,11
                                 depends 235:2
 312:11 315:22 335:12,12
                                 depicted 244:20
 336:22 341:14 346:22 380:25
                                 depiction 248:21
 380:25 382:10
                                 Deponent 384:5
days 49:24 50:5 93:19 163:3
                                 deposition 1:17 6:5,11,14,15,17
 257:2,19 258:10 384:9,10
                                   7:2,23 8:17 9:13 22:22 32:25
deal 106:16 141:19 157:16
                                   44:15 381:18 384:5
deals 370:18
                                 depositions 45:10
Dear 384:7
                                 describe 161:17 186:15 255:17
December 68:9 357:18
                                   272:11 288:23 348:13 373:15
decide 97:25
                                 described 4:4 59:18 64:25 71:2
decided 98:2 209:25 266:13
                                   256:11,15 257:22,25 258:25
 268:4
                                   259:4 270:6
                                 description 261:23
decision 97:23 98:4 210:3
 268:18 346:13 349:17 350:22
                                 designation 148:5
 362:24 368:14 380:20
                                 designed 357:5
                                 desire 356:22
decisions 362:7,15,18
deck 266:25 267:2
                                 destroying 222:5,12
deeper 157:12 162:4
                                 detached 233:18
defendant 6:6 160:22 170:14,22
                                 detail 36:23 69:11 107:16
 171:6,14 172:18 173:4,11
                                   156:19
 220:23 263:7 264:2 284:22
                                 details 88:9 140:19
 292:22,25 294:3 342:17 344:14
                                 Detective 162:16
 345:15,19,25 346:7,12 349:23
                                 determine 111:2,24
 350:6,10 352:6 380:10,15
                                 develop 48:3
Defendant's 4:19
                                 developed 236:8
defendants 1:15 2:8 7:21 253:17
                                 developing 156:18
 262:7,11,21 342:16 344:12
                                 diagram 290:15
 373:14,22 380:4
                                 Dick 99:14,15
defendants' 5:9,11,13 11:5 21:5
                                 diff 125:12
 102:7 116:3 127:9 132:20
                                 different 10:11 50:3 73:7 95:14
 133:5 146:13 148:6 163:15
                                   95:14 100:20 112:17 116:13,17
 164:19,25 165:7 173:22,22
                                   120:10 125:11,12 135:3 140:18
 175:10 230:8 243:10 249:16
                                   194:3 256:13
 313:9,19 337:20,20 342:24
                                 difficult 163:17
 345:7
                                 difficulty 214:12 217:2
Defender 262:20
                                 dig 159:21 160:13
defending 268:4 284:21
                                 digital 117:18
                                 dining 156:5
defense 205:15
definitely 132:12 144:4
                                 diploma 14:13
delayed 300:2
                                 direct3:4 7:16 45:24 170:15,23
delegated 252:5
                                   171:7 172:19 173:5,12 177:10
delivered 384:10
                                   320:13 333:16 361:22 362:6
demanding 224:16
                                   366:14 370:12 373:25 376:15
Demarco 28:11
                                 directed 61:13 297:14 362:23
democrats 171:18
                                 directing 227:18 241:23 242:10
deny 202:3
                                   253:8 299:22 313:23 315:13
department 13:21 17:4 103:23,25
                                 direction 150:13 253:17 262:7
 161:19 162:5,6,10 182:18
                                   262:11,20,25 263:7,14,16,17
```

```
263:25 264:4,6,11 297:7
                                   297:25 352:24 374:19,21 375:2
directive 253:3
                                   375:2
directly 113:25 138:13 158:8,10
                                 disruptive 357:4
 346:25
                                 disruptor 285:4
director 12:19 368:23
                                 disruptors 271:17 272:3 273:17
disagree 222:4
                                   288:20 357:3
disagreed 269:3 282:19 349:24
                                 distances 247:21
 350:6,10
                                 distributing 191:18
disagreement 222:11 349:19
                                 district1:2,3 7:25 56:10
disagreements 282:22 283:6
                                   352:11
                                 document 5:13 21:19 23:3 128:13
disapproving 60:6
disclosure 4:8 5:2 102:10
                                   135:21 139:14 146:15 147:8,14
 173:23 313:9 342:17
                                   147:16,22 175:17 231:15
disclosures 4:12,17 5:15 116:14
                                   243:14 313:12,24 362:13
 133:4 146:17 148:8 165:2,12
                                   367:22
 175:14 230:11 243:17 244:10
                                 documentary 378:17,18
 249:19 314:19 337:22
                                 documents 3:18 66:7 117:15
discount 292:5
                                   135:5,19 136:5,7 148:10 149:9
                                   149:13 150:7,24 230:13 308:16
discovery 313:13
discriminatory 377:2,9 379:16
                                   313:9
discuss 77:7 82:7 84:2,5 163:14
                                 doing 12:16 38:4 62:3,4 68:3
 255:22 275:7 283:11 284:7
                                   77:2,8 83:23 103:13 155:10
 352:7
                                   193:13,14,15 219:11 347:25
discussed 69:10 78:6,10 79:24
                                   351:10
 80:3 85:19 104:4,16 107:22
                                 dollars 109:19 110:3,6,8,12,15
 131:19 150:14 167:23 174:10
                                   110:21,24 111:3,14,20 112:2,7
                                   112:15 113:5,7,13 155:19
 215:12 236:5 237:14,17 255:3
 255:5 292:11 350:19
                                   157:24 158:3 353:4,12,25
discusses 184:7
                                   364:24 365:3
discussing 150:20,22 263:22
                                 dollars' 180:21
 327:5 343:22
                                 Donald 196:3 197:11 236:10,10
discussion 36:20 291:8,20 334:3
                                 donate 110:5
                                 donated 114:16 155:18
discussions 22:18 235:24 289:22
                                 donations 356:10
 334:24 335:4,7,23 372:21
                                 donor 273:13
disorderly 357:4
                                 donors 3:14 112:25 113:4,15
disperse 334:4
                                   153:15 155:16 157:2,23 332:22
                                 door 274:7 295:20 318:19 330:9
dispersing 224:13
display 192:11 293:24
                                   330:13,16 331:10
displayed 288:19,25
                                 doors 268:7
displaying 293:20 294:4,8,12
                                 doubt 44:22 123:20,21 128:5
                                 dozen 27:11,12
disrupt 264:25 265:21 268:5
 300:4
                                 Dr 3:20 5:5 57:8 58:24 59:2,6
disrupted 197:16 256:7
                                   59:12,15 60:17 62:8 63:18
disrupter 294:25 295:5 300:2,9
                                   69:7 70:21 72:19 75:14 86:9
 326:20,20 327:4,8,24 328:17
                                   86:15,21,25 87:3,8,20 89:9
                                   98:2,4 99:3 104:15 108:11
 328:22 329:2
disrupting 285:10,16 287:15,20
                                   109:6 110:22,24 111:3 114:8
disruption 168:12 184:7,10,20
                                   124:17 127:18 128:22 129:11
 265:6 268:9 271:7 273:13
                                   140:25 141:6 142:2,4,25
```

```
143:10,16 145:23 154:10,19
                                 economically 192:25
 156:4 157:2 160:5,16,18
                                 economics 126:14 311:16
 175:20 176:23 178:24 186:20
                                 economist 86:16 156:3 236:7
 201:16 236:7,12 237:15,21
                                 editor 85:11
 253:14 262:17 266:16 267:22
                                 educational 14:10
 268:7 269:3,24,24 270:22
                                 effect 289:4
 271:4,8,17,18 272:3,12 273:4
                                 effectively 273:17
                                 effort 155:8 157:12 250:17,19
 273:13,15 274:2,8,17,24 275:7
 275:16 276:2 281:18 282:13,16
                                   268:5 350:21
 282:19 283:4 284:6,11,20,24
                                 efforts 300:2
 285:5,12 297:15,25 318:13,15
                                 egress 266:15
 318:15,21 319:8 323:13 326:8
                                 eight 4:21 8:2 31:18,19,19
 326:17 329:7,10 330:7,12
                                   125:25 128:16 147:6 149:7
 334:3,8 335:23 336:2,3 352:8
                                   173:22 199:16 207:7 212:6
 352:23 353:5,21,25 354:17
                                   230:12 231:10 237:25 273:25
 356:22 357:11 375:17 380:8
                                   282:8,13
drafted 251:6
                                 eighteen 116:16 125:8 230:12
drafting 250:15,25
                                   231:10 239:4 297:10
drawings 246:2
                                 eighty 180:21 266:6
dress 316:17 317:5
                                 eighty-nine 269:21 270:2,6
dressed 246:22
                                 eighty-one 266:6,12
drive 3:21 29:21 227:19 308:18
                                 eighty-two 268:3
                                 either 74:11 89:14 113:21
 308:20 314:10
driver 273:14
                                   114:17 161:5 162:11 200:14
                                   214:2 258:21 301:7 304:24
dropping 174:6
drove 99:15 332:18,19
                                   306:12 321:16,17 323:8 335:11
due 19:19 281:8 337:3 340:15
                                   346:12 363:23 373:6,21 380:21
 378:24
                                 elect28:9
duly 6:14 383:6
                                 elected 26:24 27:2,17,24 30:14
duties 251:14
                                   56:2
duty 266:24 352:21
                                 election 47:23
Dzeic 54:15 55:20,24
                                 electronic 308:15
                                 eleven 5:4 127:9 131:9 232:20
               E
                                   232:21 285:4 363:8 370:21
e-82:22
                                 eliminate 41:23
E3:2,2,2,9,9 4:2,2 12:10
                                 else's 62:11
e-board 82:25 83:6 141:3 252:14
                                 email 3:15,15,16,18,20 4:8,12
 252:17
                                   4:19,22,24 5:5,11 40:25 42:6
E.B120:11 121:5,25
                                   42:8,14 43:21 44:12,13,13
E.S.T 282:14
                                   45:12 53:20 59:25 84:13 97:5
earlier 73:17 154:11 155:22
                                   102:18 103:5,9,15 105:5,9,12
 200:7 229:4 240:17 276:18
                                   105:14,17,21,23 106:8,25
 277:20,21 311:11 348:13,20
                                   107:6,18,20,23,24 116:6,6,20
 381:3
                                   116:23,25 117:6,16 122:22
early 15:5 61:16
                                   127:14,17,23,25 128:3,25
easy 269:15
                                   129:10 130:20,24,25 131:4,8
Eat 1:21
                                   131:23,23,24 133:16 134:5
eating 142:14
                                   135:4,20 137:13,21,25 139:10
economic 103:23,24 104:2 143:4
                                   139:18,23 140:10 143:25
 236:9
                                   148:13,16 149:16 150:8 152:23
```

```
153:5 154:23 155:3 160:4
                                 enterprise 238:10
 163:10,11,14 164:23 165:3,4
                                 entire 181:8
 165:21,25 166:3,19,20 169:12
                                 entity 47:3 364:23
 173:24 175:22 176:7,16,19
                                 environment 220:3
 177:4 213:9,12,14,15,18,19,20
                                 equated 285:7
 213:22 230:16,23 231:3,6
                                 Eric 54:14 55:11
 232:7,10,11,12,17,22,24 233:3
                                 errata 382:7
 233:11,22 234:10,10 235:15
                                 escort 271:18
 236:22 238:14,16,25,25 239:9
                                 escorted 298:9 299:6 300:10
 239:11,20,23,25 253:2 258:4,4
                                  334:9
 283:16,19,20,21 307:8 337:2
                                 ESQ 2:5, 15, 21
 337:16,18,24,25 338:25 339:6
                                 essentially 13:4,5 104:2 159:6
 339:9,24 340:3,12 342:11,24
                                  271:12 283:8
 344:13,15 346:14,17,20 350:19
                                 estimation 247:19
 366:16,22 367:8 369:21,24
                                 et1:1,1 2:1,1 3:1,1 4:1,1 5:1
 370:7 376:3,8,9
                                  5:1 6:1,1 7:1,1,24 8:1,1 9:1
email's 116:21
                                  9:1 10:1,1 11:1,1 12:1,1 13:1
Email/Disclosures 5:9
                                  13:1 14:1,1 15:1,1 16:1,1
emailed 135:16
                                  17:1,1 18:1,1 19:1,1 20:1,1
emailing 340:13
                                  21:1,1 22:1,1 23:1,1 24:1,1
emails 3:19 4:10,10 5:2 37:14
                                  25:1,1 26:1,1 27:1,1 28:1,1
                                  29:1,1 30:1,1 31:1,1 32:1,1
 41:22 42:10,11,14 43:14 44:9
 60:2 102:22,23,24 104:23
                                  33:1,1 34:1,1 35:1,1 36:1,1
 105:17 106:20 107:6 116:13
                                  37:1,1 38:1,1 39:1,1 40:1,1
 126:25 131:9,14 133:6,14,18
                                  41:1,1 42:1,1 43:1,1 44:1,1
 137:11,19 149:18,22,23 153:2
                                  45:1,1 46:1,1 47:1,1 48:1,1
 153:7,23 161:9 213:25 230:20
                                  49:1,1 50:1,1 51:1,1 52:1,1
 231:4,7,9,24 232:4,7 234:4
                                  53:1,1 54:1,1 55:1,1 56:1,1
 235:13 284:4,4 292:10,16
                                  57:1,1 58:1,1 59:1,1 60:1,1
 345:16
                                  61:1,1 62:1,1 63:1,1 64:1,1
employed 13:18,20
                                  65:1,1 66:1,1 67:1,1 68:1,1
employees 335:14
                                  69:1,1 70:1,1 71:1,1 72:1,1
encourage 47:24 357:2
                                  73:1,1 74:1,1 75:1,1 76:1,1
                                  77:1,1 78:1,1 79:1,1 80:1,1
encouraging 352:23
ended 18:19 20:23,24 62:17 68:8
                                  81:1,1 82:1,1 83:1,1 84:1,1
 74:24 185:12 225:7 227:20
                                  85:1,1 86:1,1 87:1,1 88:1,1
 238:19 240:4,5 351:3
                                  89:1,1 90:1,1 91:1,1 92:1,1
enforce 356:25
                                  93:1,1 94:1,1 95:1,1 96:1,1
enforcement 349:15
                                  97:1,1 98:1,1 99:1,1 100:1,1
engage 64:13 198:20 357:4
                                  101:1,1 102:1,1 103:1,1 104:1
engaged 178:23
                                  104:1 105:1,1 106:1,1 107:1,1
engagement 86:18 156:3,10,13
                                  108:1,1 109:1,1 110:1,1 111:1
                                  111:1 112:1,1 113:1,1 114:1,1
engages 48:8
                                  115:1,1 116:1,1 117:1,1 118:1
engaging 207:19
                                  118:1 119:1,1 120:1,1 121:1,1
enjoy 130:18
ensuring 157:16
                                  122:1,1 123:1,1 124:1,1 125:1
                                  125:1 126:1,1 127:1,1 128:1,1
entanglements 157:13
enter 281:11
                                  129:1,1 130:1,1 131:1,1 132:1
entered 137:2
                                  132:1 133:1,1 134:1,1 135:1,1
                                  136:1,1 137:1,1 138:1,1 139:1
```

```
139:1 140:1,1 141:1,1 142:1,1
                                 314:1 315:1,1 316:1,1 317:1,1
143:1,1 144:1,1 145:1,1 146:1
                                 318:1,1 319:1,1 320:1,1 321:1
146:1 147:1,1 148:1,1 149:1,1
                                 321:1 322:1,1 323:1,1 324:1,1
150:1,1 151:1,1 152:1,1 153:1
                                 325:1,1 326:1,1 327:1,1 328:1
153:1 154:1,1 155:1,1 156:1,1
                                 328:1 329:1,1 330:1,1 331:1,1
157:1,1 158:1,1 159:1,1 160:1
                                 332:1,1 333:1,1 334:1,1 335:1
160:1 161:1,1 162:1,1 163:1,1
                                 335:1 336:1,1 337:1,1 338:1,1
164:1,1 165:1,1 166:1,1 167:1
                                 339:1,1 340:1,1 341:1,1 342:1
167:1 168:1,1 169:1,1 170:1,1
                                 342:1 343:1,1 344:1,1 345:1,1
171:1,1 172:1,1 173:1,1 174:1
                                 346:1,1 347:1,1 348:1,1 349:1
174:1 175:1,1 176:1,1 177:1,1
                                 349:1 350:1,1 351:1,1 352:1,1
178:1,1 179:1,1 180:1,1 181:1
                                 353:1,1 354:1,1 355:1,1 356:1
181:1 182:1,1 183:1,1 184:1,1
                                 356:1 357:1,1 358:1,1 359:1,1
185:1,1 186:1,1 187:1,1 188:1
                                 360:1,1 361:1,1 362:1,1 363:1
188:1 189:1,1 190:1,1 191:1,1
                                 363:1 364:1,1 365:1,1 366:1,1
192:1,1 193:1,1 194:1,1 195:1
                                 367:1,1 368:1,1 369:1,1 370:1
195:1 196:1,1 197:1,1 198:1,1
                                 370:1 371:1,1 372:1,1 373:1,1
199:1,1 200:1,1 201:1,1 202:1
                                 374:1,1 375:1,1 376:1,1 377:1
202:1 203:1,1 204:1,1 205:1,1
                                 377:1 378:1,1 379:1,1 380:1,1
206:1,1 207:1,1 208:1,1 209:1
                                 381:1,1 382:1,1 383:1,1 384:1
209:1 210:1,1 211:1,1 212:1,1
                                 384:1,4
213:1,1 214:1,1 215:1,1 216:1
                               evening 174:22
                               event5:5 36:6,7,10,13 48:24
216:1 217:1,1 218:1,1 219:1,1
220:1,1 221:1,1 222:1,1 223:1
                                 56:4 57:18 58:24 59:2,6,12,15
223:1 224:1,1 225:1,1 226:1,1
                                 60:14 61:23 62:20 64:19 66:8
227:1,1 228:1,1 229:1,1 230:1
                                 67:14,17 68:12,16 69:7,7,10
230:1 231:1,1 232:1,1 233:1,1
                                 69:21 70:4,9 71:14 73:8 75:14
234:1,1 235:1,1 236:1,1 237:1
                                 80:17 81:14,16 83:11,13 87:5
237:1 238:1,1 239:1,1 240:1,1
                                 87:8 88:5,11 89:9 90:6,10,12
241:1,1 242:1,1 243:1,1 244:1
                                 93:17 95:9,11,15 99:16,17
244:1 245:1,1 246:1,1 247:1,1
                                 101:9,10,13 106:7,9,17,25
248:1,1 249:1,1 250:1,1 251:1
                                 107:8,10 108:23 110:16 111:21
251:1 252:1,1 253:1,1 254:1,1
                                 111:25 114:9 115:10,13 119:2
                                 119:2,8 120:19 124:17,18,22
255:1,1 256:1,1 257:1,1 258:1
258:1 259:1,1 260:1,1 261:1,1
                                 127:18 128:14,22 129:11,15,22
                                 130:6,10,21 135:19 136:2
262:1,1 263:1,1 264:1,1 265:1
265:1 266:1,1 267:1,1 268:1,1
                                 137:10 138:17 140:15,17
269:1,1 270:1,1 271:1,1 272:1
                                 149:17 160:6,17,19 161:5,5,15
272:1 273:1,1 274:1,1 275:1,1
                                 161:23,25 162:12 163:2,4,5
276:1,1 277:1,1 278:1,1 279:1
                                 166:5,24 167:9,12,21 168:2,4
279:1 280:1,1 281:1,1 282:1,1
                                 168:6,9 169:9,24 170:17,18
283:1,1 284:1,1 285:1,1 286:1
                                 171:2,3,10,10 172:22,22 173:8
286:1 287:1,1 288:1,1 289:1,1
                                 173:8,15,15 174:22 175:4,20
290:1,1 291:1,1 292:1,1 293:1
                                 176:9,10 177:21 178:7,24
293:1 294:1,1 295:1,1 296:1,1
                                 179:13,16,16 181:8 183:10
297:1,1 298:1,1 299:1,1 300:1
                                 184:2,8,21 185:2 193:12 194:7
300:1 301:1,1 302:1,1 303:1,1
                                 194:7,9 200:10 201:22 205:12
304:1,1 305:1,1 306:1,1 307:1
                                 210:9,10,13,16 212:3 214:2,3
307:1 308:1,1 309:1,1 310:1,1
                                 217:18 219:7 221:15,21 230:4
311:1,1 312:1,1 313:1,1 314:1
                                 230:6 236:2,4,25 237:17
```

```
241:19 242:6,19,23 243:20,21
                                 executive 260:5 339:13 344:17
 246:22,23 252:9 253:5,14
                                   365:10
 254:8,8,25 255:8 256:7,17,18
                                 exhibit 4:19 5:9,11,13 11:5
 256:22,23 257:20 258:5,10,15
                                   21:5 47:17 64:12 75:18 102:5
 258:22 262:18 264:25 265:6,7
                                   102:8 103:7 116:3 120:7 125:8
 265:14,17,22 266:11,14,24
                                   127:9 128:18 132:7,13,20
 268:5,7,9,15,25 269:24 270:22
                                   133:5 139:18 140:3,6 146:2,13
 271:8,19 272:14 273:16 274:2
                                   148:6 163:15 164:19 171:13
 274:8 277:13,17,22,25 278:17
                                   173:18,22 175:10,14 177:7,14
 278:20 279:3 281:11 282:13
                                   201:8 217:5 230:8 238:4
 283:22 285:16 287:15,20
                                   243:10 244:14,16 249:16
 289:14,24 290:5,8 291:21
                                   264:22 266:6 268:3 270:20
 292:12,12,14,18,23,25 293:5,8
                                   273:24 279:7 282:12 294:17
 294:5 300:5 301:14,18 304:8
                                   313:8,20 314:9,22 337:14,15
 305:17,18,19,22 307:2 308:24
                                   337:21 338:15,16 342:16,19,24
 309:3,9,12,19,21 310:2,13,24
                                   344:25 345:3 346:14,15,20
 311:6,7 312:11 314:5 315:11
                                   350:19 357:22,25 361:23
 334:25 335:5,5,7,11 336:8
                                   366:11,15 368:19 369:23,24
                                   370:14,15
 341:12,15 351:15 352:8,23,25
 353:7 354:16,20 355:17 362:25
                                 exhibits 131:9 132:24 338:7
 363:19,19 369:12 374:12,21
                                   342:21
 375:17 380:8
                                 exist59:19 66:3
events 5:5 11:24 13:6 36:13,25
                                 existed 24:22 43:2
 47:8 48:19,19,23,24 49:15
                                 exit 281:10
 61:6,22 62:7,16 80:10,19 87:4
                                 expanded 356:5
 92:14 101:20 116:17 161:6
                                 experience 18:20 306:25
 169:22 188:11 209:9 243:19
                                 experienced 176:15
 255:18 268:8 281:17 297:13
                                 experiences 73:14 143:3,3
 301:7 303:22 304:25 305:9
                                 Expires 382:12
 351:13,21 352:8 368:21 373:7
                                 explain 42:21
                                 express198:12 222:11 269:4,9
 380:24
eventually 115:14 285:25 300:2
                                   376:25
                                 expressed 219:14 375:16 380:7
everybody 243:2 291:16 312:17
                                 expression 300:5 377:3
everybody's 318:8
                                 expressive 46:6,14 48:8,9 64:13
evidenced 377:2
                                 extended 43:18 232:23 234:12
ex 356:5
                                 extent 23:24 41:9 62:4 84:20
exact 58:9 65:15 93:19 240:12
                                   150:13,16 168:14 359:25
 241:7 248:19 259:9
                                 extra 235:25 236:25
exactly 250:23 254:2
                                                 F
Examination 3:4,5,6 7:16 379:22
                                 F3:2
Examining 384:6
                                 F.R.C.P 313:10
example 204:10
                                 Facebook 3:11 5:7 29:17 40:6,15
examples 204:21
exceptions 382:6
                                  41:13 42:4 43:14 55:23 66:13
                                  89:25 91:19 150:8 249:23
exchange 165:15 174:2
                                  346:21
exchanged 98:15
                                 facilitate 109:13 154:10 268:4
exclamation 239:13
                                 facilitated 352:9
excuse 42:20 136:9 141:11
                                 facilitation 374:21
```

```
facing 196:12
                                 feel 136:2 269:11 361:19 374:25
fact 95:3 111:15 190:23 253:21
                                 fees 143:11,15
 289:23
                                 feet194:21,23 195:7,16 247:25
facts 23:22 84:5,9 218:18
                                   248:9,12,13,20
faculty 367:17 368:14 372:19
                                 fell 65:17
 373:6
                                 fellow 48:11 317:12,16 320:4
fail 384:10
                                   321:22 323:20
failing 352:21
                                 female 261:20
fair 11:2,7,24 16:8,11 26:2
                                 Fest 202:25 203:3,7,8
 29:2 35:9 42:19 46:25 49:9,20
                                 field 52:6 189:8 195:9,11
 49:22 50:5,11,15,19 51:25
                                   209:21 215:6
 67:19 68:11 69:16 79:17,18
                                 fifteen 5:12 109:19 110:3
 86:6 94:23 101:3,22 128:21
                                   112:16,17,18 113:5,12 120:7
 137:23 138:2,25 145:11 152:20
                                   155:5,19,20 185:8 246:5,10,14
 158:6 175:9 200:11 202:9
                                   294:14,16,18,22 295:16 296:13
 212:10,21 246:18 248:20
                                   313:20 314:9 315:19,21 357:22
 269:11,19 301:2,4 367:24
                                   357:23,25 358:2
                                 fifty 134:5 157:9,9,23 158:3
 368:13 374:9
fall 15:2 16:2,13,15,16 17:6,15
                                   159:25 160:2 168:19 178:18
 17:17,21 19:7,14 20:4,6,15,22
                                   180:2,3,8 195:14 217:4,4
 25:8,10,16,22 26:12,17 27:2
                                   238:20 240:5,9,25 311:3
 27:10 34:6 36:5 38:18 43:3,15
                                   324:22
                                 fifty-224:11
 43:16 47:13 50:8,9,10,10,19
 52:9 63:14 64:23 65:12 66:4
                                 fifty-eight 375:13 380:3
 70:20 71:3,6,13,20 74:6 76:13
                                 fifty-five 238:12
 77:21 79:11,15 93:25 100:19
                                 fifty-four 318:20
 171:22 203:11,13,17,20,22
                                 fifty-nine 249:20 328:15
 205:20 206:12,12 211:9,10
                                 fifty-one 220:21
 213:13 251:15 252:13,19
                                 fifty-seven 317:9 373:11
 302:14,17 303:3,4 331:16
                                 fifty-six 328:8
 372:9
                                 fifty-two 174:19
falling 331:17
                                 figure 33:14 45:12,13 139:8
                                 figured 150:2
false 199:25
familiar 201:2
                                 file 308:11
far 76:16 88:21 94:14 95:7
                                 filed 22:5,6
 114:4,20 118:13 122:8 131:16
                                 filled136:17 137:10
 136:14 165:23 169:21 171:17
                                 filmed 80:16
 190:6 194:13,15 196:8 210:4
                                 final 125:8 128:17 236:18
 247:19 277:6 304:5 306:5
                                   239:19 251:10 337:13
 325:11 327:12 332:5 351:17,19
                                 finalized 140:16
 365:25 377:16 381:12
                                 finally 9:18 58:16 173:10
father 10:24
                                   236:12
                                 finance 115:17 141:22 243:22,24
fear 356:24
                                 finances 356:16
featuring 236:7
                                 financial 157:6 353:2 356:9
February 44:18
Federal 6:4 8:10
                                 financing 363:23
Federation 89:21
                                 find84:21 137:25 138:5 149:22
fee 94:22,23 109:17,20,21,22,25
                                   163:18 269:18
 114:8 145:6 160:8 355:22
                                 finding 108:22
```

```
fine 34:21 100:5 185:20 223:11
                                 folks 135:22
finish 15:4 361:10
                                 follow 135:10
finished 15:6,16,17
                                 follow-up 379:24
fire 279:10,18 280:9,19,21,21
                                 following 61:3 103:18 118:4
firm 343:20 344:8
                                   120:17 231:19 238:9 363:18
first8:16 12:25 17:10 22:9,16
                                   368:21
 25:5,7 27:16 28:10 34:3 36:24
                                 follows 273:12,25 281:8
 36:24 49:24 50:6,6,7 65:4,6
                                 food 9:15
 75:17,18,19 81:2 93:13,15
                                 foot 248:3,4,19
 103:6 117:21,25 129:10 140:2
                                 footage 248:23 320:25 322:2,10
 140:5,6 146:23 148:11 153:19
                                   322:24
 155:6 165:21 171:24 187:20
                                 football 195:9,10
 189:18,20 203:18 221:16,21
                                 force 267:3
 229:14 230:20 237:25 249:24
                                 foregoing 382:3 383:3,8
 266:12 269:4 288:18 302:14,22
                                 forget 162:18
 302:23 303:16 317:7 363:8
                                 form 6:8 296:20 352:22
                                 format 134:8 135:2,3 138:23
 366:15 367:21 373:15 377:25
Fisel 359:15,17,22
                                 formed 294:23
five 4:14 14:2 31:18,18,19
                                 former 150:11
 45:22 47:17 64:10,15 83:22
                                 forth 195:2 258:21
 110:8,11,15,21,24 111:2,13,14
                                 forty 239:20 361:23 362:2,3,5
 111:20,25 112:7 116:17 146:13
                                   363:4,11
 165:25 166:3,19 194:21 217:20
                                 forty-64:9,14 177:16 199:15
 224:12 235:16 325:9 328:3
                                   207:6
 332:9 366:11,16 368:19 377:21
                                 forty-eight 102:12,14 177:11,17
 377:23
                                   177:25 197:25 198:24 204:7
five-365:2
                                 forty-five 64:4 65:2 168:15,18
five-hundred 364:24
                                   183:15 243:16 352:19
five-hundred-dollar 364:18
                                 forty-four 64:11,12 243:16
flash 314:10
                                   326:3
flawless 285:9
                                 forty-one 133:4
flew 354:15 355:5,7
                                 forty-seven 102:11,13 177:11,19
fliers 238:21
                                 forty-six 356:21
flights 353:6 354:13
                                 forty-three 329:9 372:17
                                 forty-two 324:15 370:13,16
flooded 274:10
                                   371:24
flowers 240:25
fluctuated 27:4 38:23
                                 forward 331:18 352:20
fly 95:4 301:6 355:2
                                 forwarded 126:25 127:15 128:6
flyer 210:23,24 211:5 236:11
                                   128:10 153:5 232:22 234:11
                                 forwarding 117:15
 265:3,23,24 309:13
flyers 48:10 63:9,16,21 179:12
                                 found 137:24 365:3
                                 Foundation 1:7 7:24 90:16 91:24
 179:19,22 180:11,14 186:20
 193:12 198:22 207:14 217:13
                                   91:25 93:7 99:7 103:22 104:3
 240:6,10,12,18 241:8 301:7
                                   107:19 154:17 156:2 157:8,24
 309:11 311:3
                                   160:2 238:10 250:20 254:25
focus 48:15
                                   289:16,23 371:18,22 372:7,8
                                   372:10 373:2,5 374:4,5
focused 198:21
                                 four 4:11 31:19 39:18 45:22
focuses 374:18
folding 64:17
                                   47:17 83:22 132:7,20,25 133:5
                                   139:18 140:3,6 146:2 233:12
```

```
233:22 270:17 278:14 279:7
                                 G.P.A20:16
 325:8 328:15 342:20
                                 Gagliano 85:5,7,10
four-time 57:3
                                 Gallagher 4:19,22 162:16,16,20
fourteen 5:10 47:16 48:6,16
                                   162:22 164:23 165:17 167:5,21
 63:7,24 65:2 116:15 117:22,24
                                   169:3 170:3 173:25 174:6,19
 118:21,24 212:11,12,21 278:7
                                   176:8,23 219:11
                                 Gallagher's 165:21 169:12
 288:17 342:16,24 345:7 346:15
fourth 322:5
                                 gather 312:18
fracking 56:10
                                 gauge 246:6
frankly 214:5
                                 general 2:9 23:4,6 48:20 117:14
                                   134:13,16,18,21,23 135:25
FRCP 5:13
Fred 156:23
                                   136:11 168:2 193:2 217:25
                                   351:11 384:12
free 51:22 136:2 179:17 224:14
 238:10 288:19,24 289:3,14,24
                                 General's 7:20
 290:14 292:11,17 293:20 294:4
                                 generally 176:13 182:3 247:23
 294:8,12 301:4 311:14,19,20
                                 generated 366:12 373:21
 312:4,8 319:13 324:22 325:2
                                 generating 239:8
 325:10 328:15 352:22 373:13
                                 gentleman 319:25
 377:12 378:6
                                 genuinely 158:17
freedom 156:4 195:24 371:19,25
                                 George 56:25 57:2,3,7 58:16
 372:3,23,25 377:5,7
                                   96:3 103:11 113:19,21 144:6
frequency 34:9
                                   144:13,14 145:11,12,23 156:23
freshman 14:20,25 15:16,17
                                   167:15 237:18,22
 27:18 77:22 79:9,11 93:23
                                 getaway 273:16
 95:20 302:7
                                 getting 64:8 94:12 96:4 104:15
Friday 233:11 257:10
                                   107:23 109:24 200:20 214:12
friends 40:7,15 55:23 57:13
                                   224:3 238:19 252:17 272:21
 87:23 89:25 97:12 172:9
                                   284:25 325:13 326:4 347:19
front 2:22 63:8,23 91:21 177:8
                                   365:21 366:23 376:7
 272:20,20 273:8 289:8 291:17
                                 giant 51:22
 324:25 326:12,13 328:21
                                 give 8:19 12:6,7 87:10,11
 337:10 349:5,13 357:23
                                   113:16 127:9 164:10 185:17
frozen 320:15
                                   214:13 215:4 235:23 253:3
full 7:12 8:15 9:24 26:11 43:12
                                   261:23 269:11 280:23 291:12
function 159:4,6 252:13
                                   302:12,12 311:7 361:19
functioning 47:3,25 351:17
                                 given 84:17 109:22 110:14
funding 94:11 109:14 111:24
                                   113:13,14 235:2 240:13 263:16
 160:5 364:3 365:8
                                   263:17 268:14,21 311:22,25
fundraising 307:8
                                 giving 8:21 174:12 263:13 383:6
funds 113:16 157:14,16 353:19
                                 glad 176:8
 364:10
                                 glasses 316:24
further 6:7,10,13 22:21 98:11
                                 Glock 246:4
 106:19 285:6
                                 Gmail 148:12 213:20
future 48:4
                                 qmail.com 131:5
fuzzy 16:7
                                 go 8:15 15:19 19:22 25:6 31:8
                                   45:4,18,21 47:15 49:6,6,23
               G
                                   50:10 65:24 100:24 119:19
G1:14 3:2 125:24 128:16
                                   120:4 121:18 123:10 132:18
G-A-G-L-I- 85:7
                                   133:25 138:4 140:2 143:24
G.O.P 55:14 56:2
                                   146:5 149:22 151:14 152:8,9
```

```
152:22 164:14 177:6 182:22
                                 Grassroots 17:4
 197:24 198:23 204:18 217:21
                                 gray 316:9,17 318:18
 218:2 231:8 232:19 253:7
                                 great100:3 167:4 226:12 318:17
 254:6 259:3 264:18,21 266:5
                                 greater 69:10
 267:25 284:17 297:9 298:15,18
                                 greatly 27:4
 299:24 314:25 315:3 323:13
                                 Greek 367:16 368:14
 325:2,20 328:2,11 330:23
                                 greeted 285:9
 331:3,9,20,25 332:11 333:8,14
                                 grew 10:12
 336:19 363:3 367:13 368:21
                                 grill 283:7
 375:10 376:20
                                 ground 8:20 153:16 245:3 246:12
goes 156:19 366:6
                                 group 12:25 24:12,14,16,20
going 8:20,21 11:4 18:11 30:5
                                   28:13 33:24 37:6,23,24 38:7
 38:5 41:8 43:7,13 44:10 45:18
                                   41:19,21 42:3,24 52:22 53:15
 45:21,24 46:3 48:19 70:18
                                   58:18 79:14 95:14 101:21
 75:16 77:9 80:21 87:11 89:3
                                   113:8,10 169:20 171:19,20
 91:20 93:7 99:22 102:5 106:2
                                   187:5,14,16,21,24,25 212:23
 106:6,12,18 113:3 115:25
                                   213:14 220:2 221:2 243:19,25
 116:7 127:4,8 131:18 132:12
                                   250:17,19 273:3 276:24 278:7
 132:19 135:8 137:8 138:4
                                   281:17 291:13 299:8,13 303:15
 139:12,24 146:12 147:8 148:4
                                   312:3 320:10,11 321:10 333:6
 149:21,23 150:10 156:20 160:5
                                   341:7,9 348:9,13 351:17,25
 161:24 164:12 168:3,4 175:2
                                   368:2 373:8
 177:10,13 185:15 186:8 194:25
                                 group's 128:14 370:24
 209:13 210:12 213:8,24 215:15
                                 GroupMe 42:2,20,21 43:2,13
 215:16 223:17 230:7 235:25
                                 groups 52:25 99:10 167:3 169:13
 236:12 244:8 253:13 255:7,25
                                   170:4 206:23 207:4 265:2,22
 256:5 266:24 267:12,15 268:25
                                   347:10,19,24 348:24 367:16,17
 272:13 284:2 300:17 312:24
                                   367:25 368:12,14 377:4,6
 313:8 314:8,23 315:22 322:12
                                 grow 10:10
 322:13 323:13,13 327:23 328:9
                                 growing 156:17
 328:21 333:16,19 337:19
                                 quess 9:21,21 43:2 113:19 175:2
 341:21 347:6,7 349:25 352:20
                                   212:21 247:9 248:10 252:22
 358:8 360:19 361:25 368:3
                                   344:16 361:18 374:19
 381:15
                                 quessing 34:17,18 190:13
Goldwater 94:20
                                 quests 281:9 282:5
good 7:18,18 97:21,23 99:25
                                 guidance 135:25
 210:25 219:19 239:8,12 242:24
                                 quideline 66:19
 247:21 248:3 267:6 325:6
                                 quidelines 4:15 5:11 146:16
 340:13
                                   147:15,23 366:11,12,19,20
goodbye 298:5 331:24
                                   367:15,20
Google 3:21 308:17,20
                                 gun 195:24 245:22
                                 guns 195:19 197:8,18 220:15,18
gotten 115:16
                                   246:2,3
government 47:24
grab 44:9 325:2
                                 guy 96:16 214:16 228:19 272:24
graduate 20:12,14
                                   316:8 317:23
graduated 20:22 28:14,15
                                 guys 164:6 235:3
graduation 25:16
                                                 Η
grand 109:21
                                 H 4:2
granting 371:24
                                 H-A-Y-E-S 41:7
```

```
H.S124:4
                                  headed 218:13
hair 316:9
                                  heading 382:4
half 195:9,10 227:23
                                  hear 23:22 33:23 61:8 197:22
halfway 342:25
                                   226:13 227:3 251:24 260:11
hall 118:24 125:6 259:11,12
                                   279:12 293:7 299:21 319:10
 264:17 266:14 268:6,8,14,15
                                   324:10 358:11
                                  heard 206:10 223:16 255:17
 268:22 269:9,12,13,15,18
 274:4,5,22 281:11 297:15
                                   286:17 358:23 359:14 360:12
 298:4,8,10 299:15 314:4,5
                                  hearing 6:16 206:9 297:20,23
 331:20 333:5,9
halls 65:25
                                  heckler's 255:6,9,16
Hamilton 2:5 53:23
                                  heckling 185:20
Hamilton's 344:8
                                  height 38:24
hand 7:5 11:4 164:13 179:12,17
                                  held26:10,14 34:25 48:24 50:25
 179:20 180:14 210:18 250:11
                                   51:2 61:6,22 62:7 65:8 69:4
 250:21 290:13,23 295:20
                                   74:2 76:19 93:4 178:8,9
 300:12 301:7 313:15 318:6
                                   182:24,25,25 363:23
 330:8,12 342:21,21
                                  help 92:12,13 96:20 109:25
handed 21:4 180:11 191:15
                                   179:6 209:22
 207:14 217:11 238:20 240:5,9
                                  helped 12:25 54:14 87:9 113:16
 240:12,18,25 241:8 243:9
                                   153:15 154:9,19 188:25 189:9
 285:10 290:5,7 295:25 300:3
                                   226:4 252:25
 301:9 311:2 312:10 327:7
                                  helpful 293:10
handing 147:12 198:22
                                  helping 92:8 254:24 285:5
handle 256:7 365:9
                                  helps 192:19
handled 109:23 159:15
                                  hereof 382:4 383:6
hands 114:12 289:3 290:15 318:9
                                  hereto 383:5
 324:15
                                  hesitant 280:23
handy 132:14 313:6
                                  hey 185:17 219:11
hang 181:13 332:10
                                  hi 129:11 135:18 137:10 230:23
happen 142:11 144:8 256:6
                                   233:14 238:18
happened 19:21 97:17 98:14
                                  high 14:11,13 64:18 177:21
 144:10 161:22 168:10 188:20
                                  hired 270:22 271:2
 188:23 205:19 256:6 272:11
                                  hiring 353:7
 287:24 291:23,25,25
                                  history 14:11
happening 179:17 184:17,21
                                  hit 18:16,21 323:12
 223:7
                                  hold 26:6, 9, 12 33:24 36:13 55:4
happy 103:13
                                   93:3 101:20 132:21,23 243:15
hard 52:14 216:17 269:12 318:3
                                   302:3,6 303:2 336:6,7
 322:10
                                  holding 166:24 206:16,17
Harvey 1:14 160:25 170:22 173:4
                                  home 168:14
                                  homophobic 379:10
 242:3 264:7 292:22 344:17
 345:12 349:25 350:8
                                  honestly 8:4
hat 226:7,9 319:21
                                  Honor 115:15 141:18
HAYDEN 2:15
                                  honorarium 353:5,22 354:2
Hayes 41:3,6,7,8 141:8
                                  hoodie 325:18
he'll 116:10 132:6
                                  hoodies 276:12
head 9:6 19:2 29:20 40:6 74:20
                                  hook 97:9
 89:20 97:2 188:10 204:20
                                  hoops 269:17
 208:5
```

```
hope 173:20
                                  inaccurate 240:14 287:14,19
host 101:6 108:9 110:16 350:3
                                  inch 248:16
 356:22
                                  inches 248:4,14
hosted 48:24 64:25 70:6,12,22
                                  incident 80:16 101:11 178:22
 71:15 99:14 351:13 357:10
                                   217:6 250:2,9 352:8 377:22
hosting 48:10 51:10 63:24 64:2
                                  incidents 11:8,11 80:11
 72:16 73:10 189:24 265:6
                                  incited 220:25
hot 179:17 180:15,16,17,19,24
                                  include 64:15
 181:3,5 186:20 191:19 198:22
                                  included 137:15,16 238:9 284:5
 207:14 210:12 217:11,12
                                   346:15
hotel 142:12,15,17
                                  includes 353:4
                                  including 48:9,22 63:14 64:24
hour 99:22 182:6 183:14,15,17
 185:6 268:15 270:21 273:25
                                   70:20 71:13 108:6 170:17,25
                                   171:2,10 172:21 173:7,14
 274:16
hours 178:22 181:15 182:7 217:6
                                   236:10 258:5 265:2 357:3
 217:10,20 269:23
                                  inclusive 383:10
house 10:20,23
                                  incorporated 143:10 145:6
housekeeping 244:5
                                   339:16
how's 38:5
                                  increase 212:2,4 266:13
huh 138:15
                                  independent 176:18,20
human 248:11
                                  Index 1:9 384:4
hundred 110:8, 11, 15, 21, 24 111:3
                                  indicated 376:4
 111:13,14,20,25 112:7 157:23
                                  indivi 293:8
 158:3 180:4,5,7 239:21 240:3
                                  individual 86:7 285:25 286:11
                                   286:14,21 287:12,17 290:13
 240:5,9,25 311:3 353:3,12
 365:3
                                   322:4 323:2
hundreds 274:8
                                  individuals 39:6,8 55:15 56:23
                                   89:13 90:7 106:24 112:18
hunt 139:7
hyperlink 367:9,10 370:5,8
                                   156:9 168:13 186:23 221:15,20
hyperlinks 366:25 367:4,13
                                   261:23 276:9,25 282:5,21
                                   293:5,8,12 296:13 307:9
               I
                                   318:23 319:13 320:16 321:11
I.T 44:5
                                   322:6 329:15
id 347:18
                                  inevitable 273:12
idea 57:22 78:5 85:4 129:5
                                  inflated 51:21 241:12
 147:16 159:24 219:19 352:16
                                  inform 340:13
 353:15 354:4 356:4
                                  information 29:12,25 31:4 37:14
identification 314:21
                                   48:10 53:23 64:3,20,25 70:6
identified 24:17 80:9,22 147:11
                                   70:13 81:10 83:8 84:22 85:15
 173:21 314:18 332:24
                                   86:7 87:20 89:24 118:20 119:2
identify 94:15 116:8 329:21
                                   149:17 159:19 238:22 240:14
 360:15
                                   347:8
identity 72:6 91:6 113:4 156:8
                                  informed 273:13
 277:13 279:4 281:2
                                  informing 337:2
image 339:5
                                  INGRAHAM 2:20
immediately 185:13 324:21
                                  initially 221:9 251:17 287:22
impede 169:9
                                  input 373:21
imposing 266:11
                                  inquire 176:11
impossible 341:8
                                  inquiry 99:8 176:23
in-person 34:22,24
```

```
inside 281:21
insignia 277:8,10 286:18 320:9
 320:17 322:16 323:23
insignias 320:22,24 327:12
insistence 279:8
Inspector 162:15
Instagram 32:19 37:21
institute 17:3, 16, 19, 20 52:7
 338:18,20
instruction 152:2
instructions 150:14 152:16
 291:13
Int'l 383:11
intended 136:18
intention 213:2
intentionally 375:15 380:6,11
 380:15
intentions 297:4
interact 64:18
interaction 165:21
interactions 218:8
interest 239:8
interested 103:12 281:10 282:6
intern 17:4
INTERNATIONAL 384:2
internship 16:18,22,25 17:11
 18:22 19:5,7,25 20:7 25:21
 33:21 306:25
interrupt 165:5
interrupting 9:2
intro 155:25 283:12,13 284:7,8
introducing 98:17
introduction 98:21,24 103:11
 282:16,18 283:3
investigator 164:23 165:18
 169:11 176:22
invited 70:22 71:15 73:13 141:9
 281:9,15,17 282:5 305:4
inviting 48:11
involved8:16 70:15 91:13
 101:18 154:4,5,13,15 160:9
 214:8 250:15,25 252:17 258:17
 307:11 312:6 334:16,19 349:13
 357:17 371:12 372:14,20
 380:19
involvement 60:6,13 61:21 79:13
 101:9 214:10 241:22 242:9
 346:13 351:7 374:20
involving 307:9
```

```
issues 167:2 176:14 377:11,24
 378:8
it'd247:24 374:9
Italian 40:14
               J
J1:1 2:1 3:1 4:1 5:1 6:1 7:1
 8:1 9:1 10:1 11:1 12:1 13:1
 14:1 15:1 16:1 17:1 18:1 19:1
 20:1 21:1 22:1 23:1 24:1 25:1
 26:1 27:1 28:1 29:1 30:1 31:1
 32:1 33:1 34:1 35:1 36:1 37:1
 38:1 39:1 40:1 41:1 42:1 43:1
 44:1 45:1 46:1 47:1 48:1 49:1
 50:1 51:1 52:1 53:1 54:1 55:1
 56:1 57:1 58:1 59:1 60:1 61:1
 62:1 63:1 64:1 65:1 66:1 67:1
 68:1 69:1 70:1 71:1 72:1 73:1
 74:1 75:1 76:1 77:1 78:1 79:1
 80:1 81:1 82:1 83:1 84:1 85:1
 86:1 87:1 88:1 89:1 90:1 91:1
 92:1 93:1 94:1 95:1 96:1 97:1
 98:1 99:1 100:1 101:1 102:1
 103:1 104:1 105:1 106:1 107:1
 108:1 109:1 110:1 111:1 112:1
 113:1 114:1 115:1 116:1 117:1
 118:1 119:1 120:1 121:1 122:1
 123:1 124:1 125:1 126:1 127:1
 128:1 129:1 130:1 131:1 132:1
 133:1 134:1 135:1 136:1 137:1
 138:1 139:1 140:1 141:1 142:1
 143:1 144:1 145:1 146:1 147:1
 148:1 149:1 150:1 151:1 152:1
 153:1 154:1 155:1 156:1 157:1
 158:1 159:1 160:1 161:1 162:1
 163:1 164:1 165:1 166:1 167:1
 168:1 169:1 170:1 171:1 172:1
 173:1 174:1 175:1 176:1 177:1
 178:1 179:1 180:1 181:1 182:1
 183:1 184:1 185:1 186:1 187:1
```

188:1 189:1 190:1 191:1 192:1

193:1 194:1 195:1 196:1 197:1

198:1 199:1 200:1 201:1 202:1

203:1 204:1 205:1 206:1 207:1

208:1 209:1 210:1 211:1 212:1

213:1 214:1 215:1 216:1 217:1

218:1 219:1 220:1 221:1 222:1

223:1 224:1 225:1 226:1 227:1

issue 94:11 244:5 378:20

issued 350:18

```
228:1 229:1 230:1 231:1 232:1
                                  129:11 133:16 134:7 135:18
                                  137:13 140:14 147:3 161:4
 233:1 234:1 235:1 236:1 237:1
 238:1 239:1 240:1 241:1 242:1
                                  165:5 166:22 171:6 173:11
 243:1 244:1 245:1 246:1 247:1
                                  174:18,20 176:8 191:9 223:4,5
 248:1 249:1 250:1 251:1 252:1
                                  230:24 233:21 234:7,15,19
 253:1 254:1 255:1 256:1 257:1
                                  235:19,19 238:6,24 239:6
 258:1 259:1 260:1 261:1 262:1
                                  242:13 254:23 259:23 260:21
 263:1 264:1 265:1 266:1 267:1
                                  264:11 277:18 282:14 293:10
 268:1 269:1 270:1 271:1 272:1
                                  312:24 338:12 382:3,8 383:3
 273:1 274:1 275:1 276:1 277:1
                                  384:5,6,13
 278:1 279:1 280:1 281:1 282:1
                                 Johnson 340:9
                                 join 25:3 220:25
 283:1 284:1 285:1 286:1 287:1
                                 joined 25:4,10 26:25 27:2,10,13
 288:1 289:1 290:1 291:1 292:1
 293:1 294:1 295:1 296:1 297:1
                                  28:19,22,24 36:25 48:21 63:13
 298:1 299:1 300:1 301:1 302:1
                                  64:22 70:19 71:12
 303:1 304:1 305:1 306:1 307:1
                                 Jon 30:20 38:16 39:8 62:2 75:21
 308:1 309:1 310:1 311:1 312:1
                                  75:24 88:13 91:2 141:7 148:16
 313:1 314:1 315:1 316:1 317:1
                                  148:18 150:20,21 151:22
                                  161:20 185:18,19 186:6,9
 318:1 319:1 320:1 321:1 322:1
 323:1 324:1 325:1 326:1 327:1
                                  188:6,13 189:2,23 190:3 191:6
 328:1 329:1 330:1 331:1 332:1
                                  191:20 194:25 208:14,23
 333:1 334:1 335:1 336:1 337:1
                                  228:16,24 303:23 317:14
 338:1 339:1 340:1 341:1 342:1
                                 Joseph 350:2,2
 343:1 344:1 345:1 346:1 347:1
                                 Jr 94:20
 348:1 349:1 350:1 351:1 352:1
                                 jrestuc1@binghamton.edu 116:23
 353:1 354:1 355:1 356:1 357:1
                                  122:16
 358:1 359:1 360:1 361:1 362:1
                                 jrestuccia1@binghamton.edu
 363:1 364:1 365:1 366:1 367:1
                                  131:10
 368:1 369:1 370:1 371:1 372:1
                                 jrestuccia1@Binghamtonedu165:4
 373:1 374:1 375:1 376:1 377:1
                                 Judaic 182:17
 378:1 379:1 380:1 381:1 382:1
                                 Judging 160:4
 383:1 384:1
                                 July 10:6 21:6 102:17 103:5
J-O-N 75:23
                                  104:12
jacket 317:13
                                 jump 22:17 269:17
                                 juncture 17:25
January 1:18 352:7
Jeff 113:19,21 153:7,11,13,14
                                 junior 302:10
 153:19 154:8 156:22 181:4
                                 justice 285:6
 332:20
                                                K
Jeffrey 273:14
                                 K-A-N-N-A-P-P-A-N 103:4
Jews 182:12,14 185:12
                                 Kannappan 3:13 90:13 103:3,4,20
Jill 87:25
job 307:5
                                  103:21 104:9,13,17 106:4
                                  107:19 108:6 133:19,21 232:5
Joe 4:19 40:13 41:15 91:9,11,18
                                  354:24
 164:23 165:17 167:4 169:3
                                 Kanopolin 354:23,23
 170:3 173:24 174:5,19,23
                                 keep 29:8 35:13 38:6 40:22
 175:7 176:7,15 219:11,14
                                  112:19 132:13 313:6 323:13
 229:4 277:20,20 316:11
John 1:6, 10, 17 2:10 3:3 7:10, 13
                                  338:5,8,10 347:5 356:8
                                 keeping 113:2
 7:19 9:25 21:23 40:19 43:20
                                 Kenyan 201:13
 88:25 99:21 103:11 122:14
```

```
Kenyon 368:23 369:3
Kestager 39:21 44:18 62:2 78:20
 88:13 91:3 141:7,15 188:4,14
 191:7 244:23 277:19 316:18
 359:4
Kestager's 44:13,15
Kevin 2:15 44:2 300:16
kind38:10 49:25 66:15,18 73:10
 78:15 93:4 98:16 108:25
 189:10 280:15 288:6 289:4,5
 308:7 341:8
kinds 176:14
KING 2:4
knew 76:8 97:12 172:5,13,15
 209:12 278:17 286:6
know 9:14,18,22 11:9,20 12:11
 16:5 22:8 24:19 28:10 31:10
 31:20 34:10 35:18 36:6,9
 42:20 43:4 44:17 46:16,20,22
 47:3,4,9,11 49:4 50:17 52:2,2
 53:3,14,16 56:6,20 57:23,25
 58:2,4,5 61:17,18 62:13,14
 63:2,22 65:9 70:5,12,14 71:10
 74:19 75:15 76:5,16 77:14,16
 77:17,20,23 78:8,9,19,22 79:6
 79:7,14,19,22 80:15,15,16,17
 81:11,13,21 82:19,23 83:5,7
 83:18 85:2,17,18,25 87:24
 88:10,13 89:13 90:8 91:16
 95:10 99:10,12 103:11 104:21
 105:15 109:23 111:4,12 112:25
 114:5,14 116:8 117:14 118:14
 118:21 119:25 121:7,9 124:7,9
 124:11,14 125:5 126:6,7,9,23
 128:10 129:3,6,20 130:4,7,12
 131:16 136:2 138:19 139:4,18
 140:17 142:17 143:8,9,13,17
 143:18 144:19 145:4,7,9,10,10
 145:14,16,18,21 147:17,24
 148:2 153:22 154:2,7,20,21
 155:15 156:8,12 158:13,14,22
 158:24 159:2,13,17 160:7
 167:3 169:24,25 170:5,6,9,19
 171:4,11,24 172:3,24,25 173:2
 173:9,16 174:23 175:16 176:22
 176:24,25 179:16,21,23 180:9
 182:3 183:4,22 185:22 186:9
 186:11 187:23 188:8 190:12
 191:6 192:9,23 195:17 196:2
 197:21 201:12,13,14 202:8,20
```

```
204:19,20,21,25 205:8 209:5,5
 209:7,10,18 210:4,15 211:15
 216:15 219:19 220:9 221:8
 225:11 229:3 230:2 237:20
 238:6 239:25 240:11 241:15,18
 241:25 242:2,12,13,17,18
 245:3,16 247:23 248:2,14,15
 248:19,23 250:16 252:7 260:21
 260:23,24 261:9,16 262:6,24
 263:2,3,16,17,18,25 264:3,8
 264:12 266:2 271:3 276:8
 277:8 278:12,14 279:3,4,20
 280:25 281:19 283:18 285:22
 285:24 286:3,10,12,13,15,22
 286:23,25 287:3,5,9,11,23
 295:3,8,12,15 296:6,9,11,12
 296:16,18,19,21 297:3 298:14
 298:16,17 300:16 301:16 304:5
 304:9,20,21 305:5 309:16
 310:11,17,20,22 312:2,5,18
 313:3 314:17,22 317:21 319:6
 319:11 320:5,19 321:25 328:21
 329:16,21,24 330:2,10,24
 331:2 333:4,7,11,13 334:15,18
 334:23 335:16 336:5,16 340:11
 340:18 343:7,9,13,14 346:5,11
 346:12,16,22 347:16 348:5,15
 349:23 350:5,9,13,16,20,23
 351:18,24 352:3 353:14,17,20
 353:21,23,24 354:3,8,9,11,12
 354:14,15,17,18 355:4,5,7,8
 355:10,11,13,14,16,20,21,22
 355:23 356:3,7,11,12 357:9,12
 357:14,16,23 358:11 359:7,12
 359:25 360:4,6,7,11 361:11,16
 362:11,16 363:2,16,21,25
 364:17,25 365:2 366:4,5,9,12
 366:13 367:6,12,18 368:16
 369:2,8,14,16,17 370:4,11
 371:8,10 372:2,9,12,15,22
 373:18,24 374:10,15,23 375:4
 375:9 376:13,19 377:11 379:13
 379:19 380:10,13,17,18,22,23
 381:6,12
knowingly 375:14 380:5,10,15
knowledge 32:8 61:6,22 80:11,13
 81:19 83:16 85:23 86:21
 170:14,22 171:7,22 172:18
 173:4,11 190:22 220:5 221:12
 238:15 241:22 242:9 245:8,10
```

```
247:6 257:4 263:6 264:6,10
                                   178:24 186:21 193:12 201:16
 268:18,21 345:19,25 346:7
                                   212:3 214:3 236:8,8,13,25
 347:15,18,23 362:8,20,23
                                   237:15,21 242:23 243:21,25
 363:18 365:13,14 373:20 374:7
                                   246:22 252:9 253:14 254:8
 375:7 376:15 380:14
                                  255:8 256:18,23 258:10,22
known 41:9 47:20 57:17 92:7
                                   262:18 266:16 267:23 268:7
 169:22 177:22 214:23 216:4
                                  269:24,24 270:22 271:4,8,18
 220:17
                                  272:12 273:4,15 274:2,8,17,25
knows 150:3
                                  275:7,16 276:2 277:13,16,25
Kuryluk 2:11 21:12 358:9 384:13
                                  278:17,19 279:3 281:18 282:13
Kyle 82:16,19,20 83:9,16,19,21
                                  282:16 283:4 284:6,11,20,24
 83:22 84:13 91:3 277:19 318:7
                                  285:3,5 289:5,14 291:17
                                  292:23 297:15,25 298:20 304:8
 318:8
                                   307:12 308:23 310:24 311:6,7
                                  312:11 315:11 318:13,16,21
L3:9
                                   319:9 320:6 323:14 325:2
L-A-U-E-R 39:25
                                  326:8,17 329:7,10,16,20 330:7
L-I-Z-A-K 75:23
                                   330:12 331:5,12,21 334:3,8,25
L.C.C2:20
                                  335:4,5,7,23,24 336:2,8
L.H118:21 166:25
                                  341:12,15 352:8,23 354:17
L.L.P2:4
                                  356:22 357:11 362:25 363:19
Lacey 39:21 62:2 78:20,22,23
                                  369:11,19 374:11,19 375:2,8
 79:2 80:4,15 88:13 91:3 141:7
                                  375:17 377:22 380:8,24
 185:21 188:4,13 189:4,23
                                 Laffer's 69:7 71:14 75:14 114:8
 190:3,10 191:7,9 194:25 196:2
                                  114:8 160:16,18 269:3 271:17
 208:14,23 209:21 210:3 215:4
                                  272:3 273:14 282:19 336:3
 215:7,16 216:12,23 226:7
                                  353:5,21 354:2
 228:16,24 244:23 246:21
                                 language 372:18
 259:25 260:2 277:19 310:16,18
                                 laptop 185:17 312:17
 316:18 317:23 359:4
                                 large 185:24
Lacey's 214:10
                                 Lastly 157:6
Laffer 3:18,20 5:5 36:6,7 48:23
                                 late 91:12
 49:18 57:8 58:24 59:2,6,12,15
                                 Lauer 39:23 91:3 188:16 317:11
 60:14,17 61:23 62:8,20 63:18
                                 laughing 168:13
 67:17 68:12,16 69:18 70:4,9
                                 law 343:20
 70:21 72:19 73:8 80:17,19
                                 lawsuit 7:25 78:7,10 79:24 80:3
 81:16 83:13 86:10,15,21,25
                                  82:7 84:3,9 149:9,13
 87:3,5,8,8,20 89:9 90:5,9,11
                                 lawyers 151:25 152:15,19
 98:2,4 99:3 101:6 104:15
                                 lead242:23 330:13
 106:7,9,17,25 108:11 109:6
                                 leaders 1:12 54:13 156:18
 110:22,24 111:3,21,25 114:3
                                  169:18 236:9
 114:17 115:13 119:2,8,10,12
                                 leadership 17:2, 16, 19 48:3 52:7
 119:22 120:18,25 122:7 123:5
                                  338:18,20
 124:16,17,22 126:12,14 127:18
                                 leading 236:7
 128:22 129:11 140:25 141:6
                                 leaning 378:6
 142:2,4,25 143:10,16 145:24
                                 learn 103:13
 149:17 153:15 154:10,19 156:4
                                 leave 15:5 224:17 227:7 228:3
 156:4 157:3 160:5,8 161:5,25
                                  228:11,20 275:7 298:8,24
 162:12 170:17 171:3,10 172:22
                                  299:5 331:6 333:2
 173:8,15 175:20 176:10,23
```

```
leaving 223:16 227:16 228:11
                                 life 10:16
 335:24
                                 limited 93:21 108:6
lecture 65:24 118:23 125:6
                                 line 127:10 147:13 313:16 314:4
 140:17 237:2 238:8,10 259:11
                                   324:25 362:4,5
 259:12 264:17 266:14 268:6,8
                                 lined 168:12 274:4
 268:14,15,22 269:8,12,13,15
                                 lineup 71:3
 269:18 274:4,5,22 281:11
                                 LinkedIn 86:8 87:22
 297:15 298:4,8,10 299:15
                                 list 35:13,14,17 39:3 97:13,15
 311:14 314:4,5 331:19
                                   97:16,18 176:12 190:8 204:12
led 327:6 374:25
                                   213:23
left 25:21 37:6 61:2 79:22 83:4
                                 listen 219:11 280:24 358:10
 169:21 171:17 181:14 184:11
                                 listening 260:14
 184:14,17 190:19 192:2 196:22
                                 lists 366:16
 196:25 218:19 219:2 298:4,20
                                 litigation 22:24 361:6
                                 little 16:7 24:6 27:6 92:20
 298:20 315:13 321:10 331:5,19
 333:6 336:2 350:24
                                   95:4 98:16 99:22 107:14
lefter 298:20
                                   142:13 144:5,9,11 157:12
legal 221:24 343:24
                                   159:22 161:23 162:4 163:4
legitimate 361:17
                                   168:12 216:17 244:5 245:3
lengthy 235:15
                                   254:4 287:22 289:2 305:2
let's 8:15,15 14:10 25:6 26:13
                                   318:3 322:10 327:20 339:4
 27:15 45:18 47:15 48:15 50:9
                                   345:10 360:18,23 368:6 369:11
 54:17 99:24 100:5 117:14
                                   371:15
 120:4 121:18 123:10 132:7
                                 live 10:22,24 12:13 13:7 18:15
 133:25 135:10 140:2 143:24
                                   18:17
 152:22 173:17 177:6,6 197:24
                                 lived 10:15, 16 12:8, 14, 17 13:12
 198:23 203:14 204:17 231:8
                                 lives 31:20
 232:19 237:24 242:21 253:7
                                 living 233:18
 254:3 259:3 264:18 266:5
                                 Lizak1:6 21:23 30:21 38:16
 267:25 269:20 284:17 297:9
                                   44:14 62:2 75:21,25 76:5,22
 299:24 300:15 312:16 315:3
                                   88:13 91:2 141:7,15 148:19,22
 320:6 323:12 327:19 328:2
                                   150:6 152:19 161:20 185:18,19
 329:7 333:14 336:19
                                   188:6,13 189:2 190:10 191:6
letter 249:10
                                   191:20 254:23 259:23 277:18
letting 229:25 314:17
                                   303:23 304:2,7 317:14 318:5
level 47:23
                                   352:6
levels 48:2
                                 Lizak's 44:12 148:16 151:22
Lewis 56:7,23 57:7 58:2
                                 lizakjon@gmail.com 148:13,15,19
liberal 338:23 350:2
                                 local 29:22 48:2 54:13 55:2,14
Libertarian 100:17 303:14,15
                                   55:25 56:9 57:5
 348:10,17
                                 locally 96:9,25
libertarians 51:13,19 52:13,16
                                 locate 139:13
 52:18,20 57:19 93:16,22 95:13
                                 located 15:10 65:19,20 121:7
 100:12,15,19 101:2,5,8,20
                                   126:6,8 142:21 177:12 182:23
 200:14 202:24 301:24 302:4,21
                                 location 1:20 51:5 65:23 140:19
 303:5,10,21,24 304:3,7 307:24
                                  243:20 259:10 265:14
 308:2 348:3,8 359:24 362:25
                                 locations 140:18 176:14
Liberty 90:14 93:17 95:9,11
                                 Logan 33:3 38:8,9 46:24 47:2
Library 65:24
                                  74:11,17 81:2,12,22,24
```

```
majority 285:8
logical 148:17
                                 making 19:10 123:22 176:23
logistics 94:13 104:15 109:24
logo 291:5 311:25 325:22 338:25
                                   233:16 316:20 368:13
                                 male 261:20,21
long 10:14 57:14 181:13 182:2,3
                                 mamy 274:9
                                 man 96:8 206:19 272:14 285:2
 182:8 211:23 217:18 293:24
                                   287:8 317:15 323:25 326:23
 294:2 350:13 358:10 377:19
look 12:22,23 96:12 97:11,13,14
                                   327:5,6,7,17 329:16,19,21
 97:16,18 105:6 117:14,21
                                 manage 189:9
 133:11 148:9 163:25 164:5
                                 manager 12:18
 220:8 230:20 232:7 233:5
                                 map 233:15
 337:9 342:23 366:10 367:20
                                 mark 164:12 313:8 314:9
 368:18 369:24 374:17
                                 marked 4:3 11:4 21:5 102:8,9
looked 23:15 220:11 376:3
                                   116:3 127:9 132:19 133:5
looking 21:25 37:9 108:25 115:4
                                   146:13 148:5 230:8 243:10
 117:20 152:5 166:13 245:15
                                   244:9,13,15 249:16 337:20
 326:14,19 345:5 357:25
                                   342:16 346:14,20
looks 117:2,17 118:2,3,17
                                 marketing 210:16 353:8 355:24
 120:21 122:9 128:6 135:16
                                   355:25 356:6
 157:22 210:25 244:22,25
                                 marketplace 51:4 65:25 206:2,4
 246:10 248:13 317:3 321:4
                                 Marlene 52:5
                                 married 13:14
 327:16 342:19
loosely 52:16
                                 mask 321:3,7,16 324:4,6 325:23
lost 57:4 78:15
                                 masks 276:13 277:3,11 321:12
lot 52:15 106:18 113:5,6,8
                                   322:8
                                 mass 42:12
 180:10,11 193:9 194:2 217:12
 224:2 230:15 277:2 299:11,18
                                 match 92:12
 299:20 307:23 332:4,11,13,20
                                 materials 210:17 214:14 215:7
lots 233:15
                                   215:15 216:2,2,8,14 222:6
                                   228:2 230:3 353:8 355:25,25
lunch 23:15,17 140:22,25,25
 141:17,20 142:10,24 143:7,9
                                   356:6 383:11
 144:4,15 234:25 236:13,14
                                 matter 7:22,24 11:6 83:17
 237:15,21 238:7 244:2 274:25
                                   160:25
 275:2,5,6 276:2 284:11 381:5
                                 Matthew 340:9
 381:7
                                 meal 332:11
lunched 141:6
                                 meals 353:6 355:8,12
                                 mean 23:6 37:8 46:15 70:4 75:24
lunchtime 140:16
                                   92:17 101:10,13 106:24 109:21
               M
                                   129:19,25 130:3,5,8 138:8
M125:25
                                   150:5 162:7 198:17 200:11
mail 42:12 238:8
                                   207:2,3,12 220:16 231:3 235:4
mailed 355:25 356:2
                                   263:13 299:13 304:16 308:8
mailing 353:8 356:5
                                   335:14 348:19 359:18 373:2
main 10:8,15 12:9 13:12 51:2
                                 meaning 87:5 228:23 267:2 372:3
 155:3 233:20 277:24
                                 means 129:7 207:13
maintain 32:16 35:14,17 37:25
                                 measurements 248:3,15
 39:3 42:25 66:11 92:8 105:20
                                 measures 163:5 255:7
 113:9 356:15
                                 Medal 156:3
maintained 35:10 308:4,16
                                 media 41:22 145:24 258:9,14
major 55:13 88:22 233:18 368:20
                                   264:24 306:6 309:17,18,20,23
```

```
meet 35:5 62:24 94:22 161:7
                                   296:17 332:17 351:9
 167:20 174:21 335:19
                                 membership 25:2,19,20 37:6 78:3
meeting 27:5,6 34:2,7 36:17
                                   82:23,24,25 93:4 100:20
 55:16,17 58:11,18 59:9 73:11
                                   156:18 212:2,4 213:3,9,12
 73:18,19,23,25 74:10 118:17
                                  memorable 194:7
 126:15 144:19 161:9,20 174:5
                                 memorialize 104:23
 174:8,14 213:7 253:22 254:13
                                 memorialized 218:5
 254:14,17 255:4,20 256:8,11
                                 memory 136:19 138:14 262:5
 256:12,13,15,24 257:9,16,22
                                 mention 96:10 283:6
 257:24 259:4,7 260:13 261:7
                                 mentioned 12:7 24:3 38:8 39:7
 262:25 263:8 264:23 266:3,8
                                   55:9 78:19 80:24 94:22 100:11
 270:2,6,19,23 271:6 273:21
                                   157:2 229:3,5 276:18 277:20
                                   277:21 278:21 316:13 381:3
 335:10,17 341:9 346:22 352:9
 352:14,17 368:22 375:24
                                 mentions 24:3
meeting's 34:9
                                 message 357:6
meetings 33:24 34:5, 11, 22, 23, 24
                                 messages 3:11 43:14 221:2 258:9
 35:11,13,20 39:14,16 49:10
                                 messaging 108:4 150:9
 54:3,4,8,11,16 56:5,24 57:15
                                 met 57:11,14 81:19 83:16 85:23
 59:6,11,14,19 60:8 62:20
                                   86:21 189:15,18,20 229:15
 72:10 257:19 258:25 336:7,17
                                   253:16 254:7 262:19 270:23
 341:12,19,22 342:4 351:23
                                   277:21 352:6
 359:24
                                 Michael 54:12,22,24 55:2,8,18
                                   56:4,22 57:6,11,11,13 87:9
mega 326:23
megaphone 109:7,9 272:14,24
                                   141:10,14 167:16 305:23
 285:10,25 294:19,24 295:5,23
                                   319:25
 295:24 296:3,5 300:3,4,8,12
                                 Michael's 141:13
 324:12,15,19,20 326:20 327:3
                                 microphone 109:9, 10 295:21, 23
 327:8 329:2
                                   296:2 327:7
member 11:11 24:11 25:15 33:25
                                 middle 118:7
 37:10 42:8 47:12 52:8,9,12,17
                                 midway 25:11
 71:5,6 77:13,18,20,23 79:5,8
                                 mind 254:10
 81:8 82:21,22 91:12 92:22
                                 minimal 299:25
 93:22 100:12 171:24 172:16
                                 minimum 183:13,14
 187:20 191:22 192:23 193:3,4
                                 minute 234:9 269:12
 193:5,7 209:6 276:19 277:5
                                 minutes 35:10,12 36:3 168:15
 284:21 286:2,6,11,14 293:19
                                   183:15 294:20 332:9 358:10
 294:18 296:7,10 303:23 304:2
                                 mix 298:12
 327:9 360:3
                                 mixed 18:25
members 27:3, 9, 13, 22 30:25
                                 mob 220:22 221:2 223:21 224:14
 38:17,19,22 39:8,17,19 41:20
                                   226:4
 42:17 46:12 47:21 56:2 74:12
                                 model 92:21
 78:23 88:18 89:17 90:23 98:7
                                 modern 285:7
 100:18,24 141:3 157:11 167:2
                                 Monday 104:12 129:12 174:18
 168:21,21 169:24 171:22
                                   253:14 257:6
 178:20 187:24 189:25 190:5,5
                                 money 110:7,18 113:5,6,8,9,24
 192:8 208:14,15,16,23 209:3,4
                                   114:5,11,17 154:10 157:2
 210:7,8 211:8,14 213:15
                                   158:8 159:14,14,25 181:2,4,7
 220:25 225:21 229:7 252:15,17
                                   364:15
 258:5 274:10 276:5,10,14,16
                                 monitoring 264:24
 277:24 294:22 295:16 296:14
```

```
month 68:6 69:9
                                 moving 175:9 249:13 264:14
months 10:18 14:2 32:19 38:3
                                  288:3 295:4,9 296:22 327:3
 74:3 76:23 82:5 83:23 149:7
                                   328:17,20,25 369:11
Moore 2:10 3:4,6,10,11,12,14,15
                                 multiple 206:10
 3:16,17,18,19,20,21,22 7:17
                                 murdered 284:25
 7:19 19:4,10,13 21:9,15,18
                                 Murray 29:7 30:3 98:6 159:12,16
 22:19 30:5,8 32:21,24 33:5,12
                                  359:5
 33:14,15 34:16 40:22,25 41:5
                                 Murray's 3:10 30:6
 41:14 43:11,23,25 44:5,8,17
 44:21,24 45:2,5,13,16 49:4,12
                                 N3:2,2 4:2 118:21 120:11 121:5
 53:22 54:2,21 62:23 63:3,4
 70:25 71:5,7 82:11,15 84:16
                                  121:25 342:20,20 344:21,23
 84:19,23,24 85:7,9 89:3,5,8
                                   345:3
                                 N.Y.S164:24
 99:24 100:3,5,10 102:7,15,16
                                 name 7:12,12,19 8:15 9:24 12:20
 116:7,11 131:18,22 132:2,5,11
 132:23 133:9 139:12,15 146:11
                                  27:12 40:6,11,14 41:4 76:19
                                   78:20 82:16 84:25 88:2 122:13
 146:23 147:4,7,10 150:2,4,15
                                  141:13 153:19,19 171:24,25
 151:2,16 152:3,17 153:18,21
                                  172:3 182:9 189:11,14 234:3
 159:18,21,23 163:20,25 164:4
                                  238:6 323:5 359:19 361:4
 164:15,17 165:7,10,13 166:10
                                  384:4
 166:12,15,17 202:15 208:20
 218:20,23 221:25 222:7 231:17
                                 named 11:20 88:4 96:18 117:4
                                  171:14 319:25
 231:22 235:3,5 242:21 243:2,5
                                 names 3:14 10:3 39:4,19 54:11
 243:7 244:15,18 249:5,8,12
                                  54:18 55:9 74:19 80:24 89:13
 251:19,23 254:11 262:14,15
 270:12,15 286:7,9 293:13,16
                                 napkins 186:21
                                 national 48:2 65:9
 293:17 299:14 300:15,19
 308:19,23,25 310:6,8,10
                                 near 59:2 206:2,4 233:18 238:5
                                  325:13 327:23 329:20 368:20
 312:15,20,23 313:2,5,7,15,19
                                 nearby 269:25
 313:21 314:14,17,23 315:3,9
 315:20 316:2,4 327:19,21
                                 nearly 294:20
                                 necessarily 68:14 161:9
 328:5,7,12,13 333:24,25
                                 need21:16 44:2 45:3 130:6
 338:13,14 345:4,11 358:13,15
                                  135:21 138:12 160:13 163:24
 360:16,19,23 379:23 384:6,13
                                  273:16 365:24
Morgan 56:13,16,16,23 57:7 58:5
                                 needed 42:18 225:25 234:6 373:6
 167:15
morning 7:18,19 178:17 254:2
                                 negative 218:8 267:10
                                 negotiation 307:12
 340:13
Morthy 172:2
                                 Nelson 82:17,19,20 91:3 277:19
                                   318:7,8
mother 10:24
                                 neutral 267:7
motivated 349:17
                                 never 80:3 96:15 99:12 114:14
Motor 13:21
mouse 328:11
                                  158:7 172:10,11 202:9 254:10
                                  288:8 313:24 379:3
mouth 321:22
                                 new1:3,22 2:9,13,18,23 7:20
move 132:7 135:10 148:4 151:19
 157:16 173:17 237:24 242:23
                                  8:2 10:8,12 13:13 15:11 46:8
                                  49:24 89:21 95:5 124:23
 266:14 269:20 270:16 288:4
                                  173:17 233:21 352:10 384:12
moved 10:17 243:19 272:23 273:3
                                  384:14
                                 news 145:24 305:15 306:13
```

```
338:22
                                 number 8:2 29:15,16 32:14 57:15
                                   58:20 71:19 82:12 84:13,14
newspaper 145:2
                                   109:4 116:13 151:23 155:24
Nicole 1:24 383:2,14
night176:9 272:4 298:4 335:5
                                   156:15 157:5 212:16,22 231:9
nine 4:23 103:5 104:12 134:5
                                   241:12 313:17 336:15 341:19
 147:6 166:25 174:19 175:10
                                   378:12 383:9 384:4
 235:16 282:9,17 337:14,15
                                 numbered 45:19,25
nineteen 148:7 253:9,10
                                 numbers 146:18 147:2,12
ninety-270:16 273:24
                                 numerous 221:3 236:9
ninety-five 271:5,13
ninety-four 270:21
ninety-nine 274:7 276:4
                                 03:2,2
                                 o'clock 183:20 185:6,7
ninety-one 164:25
                                 0b 254:10
ninety-seven 273:11 374:18
                                 object 150:10 221:23
ninety-six 271:15
                                 objection 49:2 62:21 70:23
ninety-three 270:2,7 353:4,13
                                   198:13 202:13 208:18 218:18
ninety-two 173:23
                                   262:12 286:5,8 299:12 312:13
nodding 9:5
non 368:12
                                 objections 6:7
                                 obnoxiously 168:13
non-student 265:2,22
                                 observation 276:14
non-students 274:9
                                 observe 223:23
nonprofit 12:19,21 92:7 187:5
                                 observed 223:24 224:2
noon 181:22,24
                                 obtain 178:3 199:3,20 201:10,21
Northern 1:3 7:25
Northwest 2:7
                                   202:17 203:25 207:9 347:10,24
                                   349:2,18
notary 6:12 382:11 384:9
                                 obtained 200:13 204:14,23
noted 282:21 382:4,6
                                 obtaining 199:8,13 200:4 205:3
notes 25:6 40:22
notice 95:4
                                 occasion 204:6
November 11:11, 25 12:8 13:11
                                 occasionally 303:25
 48:22 60:17 61:7,24 63:15,19
                                 occur 144:4,22 168:7 205:18
 64:24 67:14,21 68:3 69:8,9,18
                                   217:18 253:24 254:13 256:16
                                   256:24 257:9 259:7 279:12
 70:3,8,21 71:14 73:7 86:13
 88:5 89:10 93:11 101:12,14
                                 occurred 11:25 48:23 54:5 62:20
                                   104:11 142:23 144:20 145:3,15
 104:5 107:8 117:3,8,8 119:14
                                   145:17 168:9 174:8 194:8
 123:2,6 124:23 126:16 127:15
 128:7,11,22,23 129:12 130:22
                                   197:17 209:10 217:9 221:6
                                   254:2,14 257:21,23 270:3
 156:5 175:25 177:20 187:9
                                   274:14 297:19 330:19 333:11
 189:16 194:18 199:9 200:8,23
                                 occurring 184:11 292:14
 201:19,22 206:25 208:2,3,13
                                 October 58:8 118:18 119:5,10,23
 209:3 211:13 212:23 213:2
                                   120:22 121:2 125:16,18 133:7
 214:24 215:18 218:9 230:22
 231:11,11,25 233:12,23 235:12
                                   135:17,17 137:9,24 139:17
                                   140:9 143:25 152:23 154:23,24
 235:16 238:11,17 239:14
                                   165:24 166:2,3,7,16,19,25
 241:10,19,23 242:6,10,19
 243:20 245:4,8 247:8,15 250:2
                                   173:25 174:18,23 176:16
                                   215:21,23
 253:14 256:23 257:20,21
                                 odd 290:4
 258:11 259:4 263:8 301:21
 303:22 314:6 315:11 337:6
                                 off-266:23
                                 offended 197:16
 340:18 380:25
```

```
offer 236:25
offering 235:25
office 2:9 7:20 26:8,23 27:17
 56:9 81:20 301:23,25 302:3,6
 307:16,21,24,25 308:2 365:9
 370:6,6,10 384:12
officer 83:5,6 165:20 167:21
 225:23 325:16 328:16,24,25
officer's 288:6
officers 174:7 225:17,20 261:3
 261:4 266:24 285:14 288:2,8
 295:4 310:17 334:19
offices 26:6,8,9 28:2,5
official 249:25 369:3 371:24
 374:11,13
officially 310:15
officials 218:12
oh 8:15 10:14 21:9 23:19 33:5
 132:9 163:22 164:7 166:10
 172:11 185:14 186:2 229:16
 295:25 321:25 331:18 359:20
okay 7:4 8:7,14,19 9:19,22,23
 9:24 10:2,14,19,22 11:2,15,16
 11:23 12:6,13,16 13:3,7,10,14
 13:22 14:4,7,14,24 15:12,19
 15:22,25 16:4,16,20,24 17:5
 17:12,18 18:8,18,24 19:10,14
 19:17,22 20:4,11,16,18,25
 21:4,25 22:12,15 23:5,12,19
 23:21,22 24:2,22,25 25:10,14
 25:18,22,25 26:5,15,20,22
 27:8,15,20,25 28:5,8,12,15
 29:2,11,14,18,24 30:13,22
 31:3,6,13,16,18,25 32:6,10,20
 33:16,23 34:6,19,25 35:5,9,19
 35:22 36:5,12,16,22,22 37:13
 37:25 38:6,12,15 39:18,22
 40:4,11,16 41:8,15,18 42:7,19
 42:25 43:10 44:4 45:17,20,23
 46:17,25 47:5,9,12,15 48:15
 48:17,20 49:13,17 50:9,14,18
 50:22 51:6,15,23 52:17,21,24
 53:3,8,14,22 54:10,17,24 55:8
 55:15,24 56:3,11,22 57:6,10
 57:16,20,23 58:23 59:2,8,17
 59:25 60:10,13 61:5,11,20
 62:5,11,15 63:3,18 64:22 65:4
 65:18,22 66:2,11,15,22 67:5,8
 67:11,13,16,19,23 68:2,14,18
 68:24 69:3,13,16,22 70:3,17
```

71:4,17 72:5,19,24 73:5,17,20 73:25 75:4,7,13,16,20 76:5,10 76:21 77:6,10,20 78:6,14,19 79:19 80:9,18,21,25 81:7,10 82:3,10 83:4,7 84:2,8,12,15 87:7,15,17,19 88:8,15,16,20 88:24 89:23 90:2,7,13,15,20 90:22 91:5,8,20,22 92:25 93:6 93:8,9,10,13,24 94:3,10,14,21 95:6,14,17 97:14 98:8,11 99:9 99:18 100:18,25 101:5,15,17 101:19 102:2,4,4,6 103:10,20 104:4,25 105:6,13,20 106:5,12 106:21 107:5,10,13,15,22 108:8,14,18,24 109:9,16,20 110:2,11,20,25 111:5,9,12,18 111:23 112:4,6,6,10,14,22 113:3,7,21 114:7,11,16,19,21 115:8,12,17,25 116:19,22 117:10,13,19 118:4,11,14,25 119:13,17,25 120:14 121:18 122:9,21,24 123:2,10,19,23 124:3 125:7,14 126:9,15,15,24 127:4,7,14,17 128:2,13,17,21 129:25 131:13,17 132:7,15,17 133:13,25 134:3 135:8 136:12 137:4,20 138:4,6,11,21 139:5 139:11,21,24 140:8,9,22 141:5 141:15,25 142:7,10,23 143:6 143:20,24 144:12,16,23 145:4 145:8,11,25 146:23 147:7,18 147:25 148:4,21 149:18,21 151:8,11,24 152:3,7,22 153:6 153:10,17 154:18,22 155:5,21 157:5,22 158:2,16,19,22,25 159:24 160:7,12,14,21 161:12 161:16 162:3,9,17,19,23 163:14,19,23 164:8,11,18 165:9,17,20 166:10,16 167:17 168:6,16,25 169:5,11,23 170:7 170:10,21 171:5,12,19 172:4,7 172:13,17,25 173:3,17 174:8 174:13 175:3,6,9,19 176:7 177:3,6 178:10 179:3,6,14,19 179:24 180:10,13,19,23 181:6 182:2,16 183:3,12,16,25 184:4 184:10,20 185:5,9,10 186:2,8 186:15,15,22 187:2,11,13,19 188:5,7,9,18 189:13,23 190:3 191:3,9,12,18,21 192:7 193:4

```
193:10 194:4,11 195:18,23
196:11,18 197:3,12,15,24
198:9,12,19,23 199:11,15
200:3,19 201:15,24 202:12
203:3,10,14,22 204:5,5,12
205:8,14,21 206:6,12,22,22
207:18,22 208:6,13 209:7,24
210:6,14,21,24 211:13,17
212:2,7,25 213:17,24 214:4,23
215:8,11,21,25 216:7,13,19,24
217:14,17,25 218:7,17,20,22
219:10,14 220:4,14,21 221:8
221:14 222:8,14,17 223:10,15
223:22 224:5,11 225:4,6,8,14
225:22 226:6,13 227:6,20,25
228:10,13,22,22 229:11,16,19
229:23 230:7,9,17,19 231:8,16
231:18,21 232:13,19 233:7
234:9,17,22 235:6,8,9,9
236:21,24 237:10,24 238:16
239:3,19 240:3,13 241:5,9,18
242:2,5,8,13,18,21 243:5,24
244:4 245:2,7,17,19 246:7,11
246:18,21,25 247:12,17,22
248:4,25 249:8,13,22 250:3,14
251:4,12 252:3,7,11,16,24
253:7,7,12,24 254:3,5 255:3
255:19,22 256:4,10,14,19
257:6,12,18 258:3,24 259:3,15
259:15,24 260:4,7,16,21 261:6
262:6,14 263:4,12,24 264:9,13
264:18 265:15,20 266:2,5
267:2,5,8,11,17,18,25 268:17
269:2,14,20,22 270:9,25 271:5
272:2 273:3,10,23 274:13
275:6,13,15,25 276:15,20
277:4,12 278:2,6,16 279:2,15
279:20 280:2,4,8,16,20,25
281:4,7 282:4,8 283:11,16,21
284:2,10,15 285:24 286:4,7,21
286:24 287:4,9,12 288:2,8,17
289:7,13 290:4,11,19,21,24
291:3,7,12,19 292:5,10,20
293:15,24 294:3,7,14 295:3,8
295:11,15,22 296:5,19 297:2,5
297:9,21,24 298:7,14,23 299:5
299:10,19,24 300:8,11,14
301:2,6,10 302:20,24 303:18
303:20 304:2,10,18,22 305:20
305:25 306:4,8,23 307:7,11,15
```

```
308:11,14,19,19 309:5,14,18
 309:25 310:5,11,16,20 311:5
 311:13 312:2,10,16,20,22
 313:4,11 314:2,8 315:9,20
 316:2,5,8,14,16,19 317:3,12
 317:15,22 318:2,11,13,22,25
 319:12 320:3,6,13,20 321:2,15
 322:3,12,16,18,25 323:12,19
 324:10,18,25 325:5,19,23
 326:7 327:11,18 328:4,5,12,23
 329:6,13,19,24 330:3,5,11,19
 330:24 331:4,11,15,16,19,25
 332:8 333:4,8,14 334:6,15,18
 335:3,9,10,22 336:19 337:16
 337:19 338:3,6,11,13,21,24
 340:5,9,12,22,25 341:6,11,24
 342:7,12,15 343:6,10,23
 344:12,18,23 345:8,15,18
 346:24 347:3,17 348:6,12,19
 349:7,14 350:4,9,13 351:12,16
 351:24 352:4 354:19 355:2,8
 355:24 356:4,15,21 357:13,20
 358:3,6,12 359:2,6,9,12 360:7
 360:10,14,15,19,21,22,25
 361:8,12,15,21,22,25 362:3,11
 362:17,22 363:3,12,17,22
 364:2,12,14,20 365:2,6,20
 366:2,5,10,14,21 367:3,7,14
 367:22,24 368:10,18 369:2,6,9
 369:17,23 370:9,12,16,22
 371:5,11,23 372:5,8,13,16,24
 373:3,10,12,19,19,25 374:5,9
 374:16,24 375:5,10,20,25
 376:3,10,14,20,22 377:13,21
 377:24 378:3,7,14,19,22
 379:12,14,20 380:2,18,23
 381:13
old 42:20 43:5 73:5
older 261:22 319:25 331:13
once 8:11 34:12 37:18 38:3
 39:14 61:25 67:8,9,11,20,24
 68:15 69:17 109:11 175:16
 200:8 274:7 305:5 336:23
 356:22
one's 173:19
one-page 175:14
ones 42:5 88:7,12 132:5,6 164:3
online 18:10,20,22 19:19 20:2,7
 20:8,9 34:22 66:24 77:4
```

```
open 129:6,14,18 130:17 140:7
                                   144:5 165:25 166:20 217:22,23
 168:23
                                   217:24 218:2,9,12,19,24
                                   220:22 221:6 230:23 233:12,23
opened 274:8
opening 265:5
                                   238:17 239:14,20 282:14
Operations 368:23 369:6
                                   315:19,22 320:8 381:19
opinion 221:14,18 222:2 269:5,8
                                 P132 4:24
opportunity 8:9 33:22 45:8
                                 P247-248 4:8
 175:16
                                 pack 224:18 227:9 228:2
opposed 265:7,16 366:7
                                 package 216:5 233:21
oppressed 284:25
                                 packed 274:4,11
                                 packet 3:17 135:24 139:16,22
oppression 285:6
                                 page 3:16 42:4 43:21 45:22
orange 317:5
order 45:4 109:14 110:7 271:18
                                   47:17,18 64:9 75:17,18,19
 273:8 280:15 373:7
                                   103:6 117:21,22,23,25 118:7
Oren 201:13
                                   120:4,7 121:18,19 123:10,11
organization 25:2 44:11 46:7,19
                                   125:8,8 127:11 133:25 135:11
                                   140:2,3,5,6,10 146:23 148:18
 47:25 48:8 52:6 56:19 64:19
 154:5,14 192:19 193:17 207:25
                                   164:24 173:23 175:13 177:12
 348:11,18 364:7 365:23 367:25
                                   177:13 230:20 232:20 233:6,8
 371:7,13 372:11
                                   235:10 237:25 238:2 244:9
organizational 213:25
                                   249:24 253:9,10 270:20 273:23
organizations 3:19 64:17 178:2
                                   273:24 279:7 281:8 282:10,10
 199:19 204:13,22 205:2 207:8
                                   284:18 294:17 297:10,10
                                   313:23 314:3 337:10,12,13,21
 363:6,15 364:4 367:16
organize 92:13 187:7 268:8
                                   342:23,25 344:18,19 345:6
organized 113:24 177:21
                                   347:4 357:24 358:4,5 363:4,8
organizer 90:4
                                   366:15 367:21 368:20,21,22
organizing 12:24 13:6
                                   369:25 370:20,21 375:11,12
                                   379:25 383:5
original 6:13,17 137:24 147:8
 342:11
                                 pages 4:10 64:7 102:11,20
Originally 302:7
                                   116:15,17 117:3 133:3 134:25
originals 249:7,9
                                   135:3 138:23 148:7 230:10,11
                                   231:8,10 243:15,16 249:18,20
Orrin 368:23 369:3
Outback 332:3,19
                                   352:20 383:9
                                 paid 114:3 143:6,15 145:6
outreach 349:12
outside 49:24 51:2,4 136:22
                                   237:21 336:3 353:11,16 354:5
 169:20 185:19 205:5,12 206:17
                                   354:9,12 355:11
 206:19 250:24 274:4 281:21
                                 pandemic 19:20
                                 panel 36:20
 284:11
                                 paper 85:14 360:5 377:12
outsiders 106:23 210:8
overall 95:22
                                 papers 3:22
overheard 185:23
                                 paperwork 59:18 66:2
                                 para 273:23
               P
                                 paragraph 45:25 46:15 48:6,15
P3:2 122:14
                                   63:7,23,24 64:4,4,9,12,14
P.B124:4
                                   129:10 177:19,25 178:18
P.C128:7 175:22
                                   197:25 198:24 199:15 204:6
P.D.F134:8 135:2 137:25 138:24
                                   207:6 217:4,4,4 220:21 224:11
P.L.O.T 169:13
                                   236:19 253:9 256:11 257:22,25
p.m1:19 129:13 140:16,17,23
                                   259:5 262:17 263:9 264:18,22
```

```
265:4 266:12 268:3 269:20
                                  pcscagnelli@gmail.com 117:4
 270:16,20 271:5,13,15 273:11
                                 pedestrian 177:24
 273:24 274:7 276:4 279:6
                                 Pelletier 1:10 7:22 161:4,10,13
 281:7 282:12 288:17 294:14,18
                                   171:6,7 173:11 242:14 253:18
 297:9 299:24 333:16,20 336:19
                                   254:7,20 256:15 260:22 262:8
 337:17 347:3,7 349:14 352:4
                                   262:11,21 263:2 264:11 271:16
 352:19 356:21 361:23 362:2,3
                                   285:13 292:25 294:3 297:13
 362:5 363:4,11 370:13,16
                                   344:14 345:16 352:25 356:25
 371:23,24 372:17 373:11 374:2
                                   373:15,23
 375:13,18 376:21 379:17 380:3
                                  Pelletier's 299:25
paragraphs 45:19 47:15 48:13
                                 pending 9:15
 65:2 177:11,16 266:5 269:25
                                 Pennsylvania 2:6
 270:6 282:8 284:18,19 347:6
                                 people 27:12 35:13 41:10 42:23
 374:17
                                   74:14 84:21 88:4 90:25 109:4
parentheses 46:5
                                   110:5 112:17,20 114:8 130:18
parenthesis 46:9
                                   141:5 142:5 155:18 156:25
parents' 10:19
                                   179:15 185:20 190:7 197:16
                                   198:9,16 206:8 212:13 217:12
parking 233:15 332:4,11,13,20
Parkway 1:21 2:16
                                   221:9 223:21 224:3 228:25
part 28:12 72:10 139:18 143:10
                                   229:2,3 238:20 239:21 240:3
 149:25 150:11,12 155:8 156:16
                                   248:21 255:17 260:25 261:18
 156:20 157:2 165:3 251:14
                                   263:21,21 277:7 278:2,7 288:5
 314:9 318:23 322:20 346:15
                                   288:7,9 319:16 320:10,11,23
                                   321:13 324:16 326:11,13
 376:25 377:8,9
                                   327:11 329:17,22 332:12,21,23
partake 45:9
participate 50:12,22 92:16,17
                                   332:25,25 346:22 358:8
participated 49:8 50:12,16,20
                                 perfectly 361:16
participating 352:24
                                 perform 152:16 352:21
particular 160:8 362:22 367:9
                                 performed 252:12 295:17
 375:13 376:15
                                 period 25:18,20 26:12 37:2
particularly 118:2
                                   40:12 43:17
                                 periodically 64:16
particulars 23:14
parties 6:4 384:10
                                 permission 53:5 200:16 348:4
partnering 219:19
                                   365:22 366:6
party 47:21 48:2,5,12 54:14
                                 permit 178:3 199:3,8,13,20
 55:12 102:24 334:2
                                   200:4,14,15,17,20 201:22
pass 127:10 180:15,16,20 230:2
                                   202:3,6,10,18,20,25 203:25
 342:22 360:19
                                   204:8,14,23 205:3,6,13 206:24
passed 217:12
                                   207:9 208:3 349:18 357:3
passerby 178:23
                                 permits 201:11
passers-by 218:8
                                 permitting 352:24
passersby 207:20
                                 person 18:15,17 30:19 41:16,25
passing 147:13 210:12
                                   53:19 113:17 139:2 159:10,10
pasta 142:14
                                   230:19 261:13 277:5 281:2
Patriots 12:25
                                   316:19 320:21 321:3,7 324:11
pattern 376:25 377:9 379:16
                                   324:12 330:25
pause 320:7
                                 person's 359:19
paused 320:7
                                 personal 3:15 77:3 81:18 83:15
pay 355:17
                                   83:24,25 85:22 86:20 105:12
                                   105:14,17 117:6 131:4,24
```

```
170:14,21 171:6,22 172:18
                                 plain 168:4 169:4 261:4,4
 173:3,11 193:8 221:12 225:14
                                 plaintiff 4:10 11:21 46:4 78:17
 227:14 232:7,10 241:21,22
                                   91:24
 242:8,9 263:6 264:5,10 268:18
                                 plaintiffs 1:8 2:3 11:16 24:9
 268:20 345:18,24 346:6
                                   83:17 85:24 86:22 131:15
personally 11:20 73:9 76:6
                                   253:15 259:16 262:18 271:19
 104:22 109:12 136:25 197:22
                                   281:9 282:5 353:2 354:7,10
 218:11 222:17 276:9,16,25
                                   356:22,24
 278:17 279:3 293:25 302:3
                                 plaintiffs' 4:8, 12, 17, 24 5:2, 15
 357:15,16 362:9
                                   64:12 80:23 81:19 102:10
persons 269:3
                                   116:14 133:4 135:9 146:16,17
pertaining 214:2 308:23
                                   148:8 175:14 230:10 243:17
                                   244:10 249:19 268:9 300:5
pertains 256:24 304:24
Peter 7:13 9:25 21:10 126:25
                                   337:22 352:5,22 357:5
                                 plan 106:8 217:17,22 218:2,5
Philips 97:9
Phillips 56:25 57:2,3 58:17
                                   271:20 275:7 291:8 292:13,17
 96:4,6,8,22,23 98:12 113:20
                                 planned 107:11 215:6 266:11
 144:14,19 145:12,23 156:23
                                   268:8 271:7
 167:15 237:18
                                 planning 66:7 106:7, 16, 17 107:7
Phoenix 12:11 13:12
                                 plate 193:9
phone 29:15,16 31:5,8 32:13
                                 platform 41:23
                                 platforms 108:5
 41:21,25 43:5 53:19 82:12
                                 play 357:21 358:9
 84:13,14 97:7 103:12,17 105:4
 150:7 151:3,11 161:9 163:9
                                  Playback 251:22
 215:8,9 254:24 256:16 260:9,9
                                 played 251:22
 323:20 324:8
                                 playing 358:22
phones 43:6
                                 please 134:7 135:18 140:18
phonetic 52:5 54:15 56:7 359:15
                                   146:4 155:6 235:23 238:6,7
photo 245:8 247:2 248:11
                                   322:16 335:16 382:5 384:8,9
photocopied 146:19
                                 PLOT 167:2 169:14,16,17,23
                                   170:11,16,24 171:9 274:3,10
photograph 244:11,11,21 245:12
 247:19
                                   276:6,10,12,14,16,19,24 277:9
photographer 353:8 355:18
                                   284:22 286:2,14,19 294:19,23
photographs 5:17 66:10,12
                                   295:17 296:9,17 320:9,17,22
                                   320:24 322:16,22 323:23
 245:25
phrase 384:16,18,19,20,21,22,23
                                   325:18 327:9,12,16 357:4
                                  PLOT's 286:17
physical 29:18 308:8
pick 195:24 245:22
                                  PLOTs 265:3,3 271:7
picked 109:11 124:23 126:9
                                 pocket 151:14 301:9
picture 244:8 248:22
                                 podcast 55:4 87:12 305:9 311:11
pictures 195:18 197:18 246:2
                                 podium 109:7 238:9,24 271:17
piece 157:12 378:18 379:3
                                   272:3,9,22 273:8 274:19
pile 337:10
                                   284:20 316:20 323:14
Pinkerton 270:22, 25 271:16, 18
                                 point8:8 9:12 20:17 22:22 42:3
 297:14 298:11,13 334:12
                                   56:21 82:13 88:13 92:22 94:5
pins 216:5
                                   99:5,19 104:16 108:16 115:21
place 10:11 105:2 159:8 344:9
                                   174:14 184:2 186:25 187:2,4,8
 382:4 383:4
                                   187:21,25 189:6,24 190:5
places 204:18
                                   191:10,15 192:8,10,13,14
                                   193:11 194:13 196:21 197:18
```

```
198:21 206:11 208:2,8,16,24
                                   186:7 188:16,17,18 195:8,20
                                   195:25 198:15,17 212:12
 209:4,22 210:4 214:9,17,21
                                   213:10 223:2 231:5 234:5
 216:11,22 219:20 220:6,11,16
 222:18 223:13 227:21 228:2,4
                                   240:11 252:14,22 254:23
 228:7,15,18,18,19,24 239:13
                                   259:22 276:19 304:9,10 359:16
 244:24 254:7 312:21 321:18
                                   365:15
 322:16 324:20 326:2 328:15
                                 power 362:6,15 363:5 375:15
 330:20 343:20 358:11
                                   380:6,16
Point's 196:5,7 198:13 216:4
                                 PowerPoint 109:6
points 198:15 286:16,17
                                 practice 44:9
police 4:20 88:6 89:12 160:19
                                 pre 72:2
 161:4,19 162:5,6,10 164:24
                                 pre-make 193:17
 169:2 173:12 218:12 219:4,7
                                 prefer 314:11
 222:18,22 223:12,24 224:5,9
                                 preparation 48:4 291:20
 224:21 225:8,15 226:14,16,18
                                 prepare 130:21 258:5
 22-7:6, 15, 17, 18 241:23 242:10
                                 prepared 364:23 383:10
 254:15,19 255:20 256:3 266:13
                                 preparing 135:25
 267:3 295:4 296:22 325:13,16
                                 presence 78:7 266:14 372:20
 326:2,22,23 327:14,23 328:16
                                   373:7 383:4 384:8
 328:23,25 334:4,10,11,16,19
                                 present12:9 13:11 63:19 70:5
 372:20 373:6
                                   70:11 73:8 74:9 75:5 80:16,18
policies 143:5 283:8 337:4
                                   86:17 88:9,10 89:11 90:8
policy 224:16 236:9 285:15,20
                                   169:2,6 181:7 191:5 205:24
 297:14 340:16 349:16 357:2
                                   221:5 228:23 229:9,10 242:5
 362:14 373:14,16,22
                                   242:19 253:21 254:16 259:16
political 48:3 55:3 64:14,15
                                   261:10 263:7,13 270:5 273:20
 376:18,18 378:25
                                   274:13 277:16 278:10,11,17
politician 57:5
                                   279:2 285:9 292:23 293:2
populated 233:19
                                   297:18 303:21 304:7 352:14
portion 247:7 282:20 283:10
                                   354:20
 353:24
                                 presentation 56:10
position 93:4
                                 presidency 26:10, 13 27:16 30:10
positive 267:9 321:24
                                   32:2 36:14 37:7 38:18,25
possible 44:14 45:7 94:15
                                   40:12 43:17 50:18 62:10,11,17
 174:21 227:10 275:16 280:21
                                   76:4,12 159:11 213:13 303:11
 322:4 334:9
                                 president 11:13 12:4 17:9,10
possibly 251:5 304:16,17 321:12
                                   18:2,5 27:23 28:3,7,8,13 29:3
post 78:5 249:24 258:14 309:23
                                   29:6 30:17,25 32:22 33:4,7,11
 358:17
                                   33:16 42:13 46:23 47:2 49:14
                                   52:19 60:22 61:13 62:2,3 72:3
post-dating 75:14 78:3
                                   74:23 76:15,19 78:24 79:10
postdating 79:15
posted 63:15,20 309:14,16,17
                                   82:22 92:11 111:9,17 141:10
poster 195:23
                                   141:19 150:12 158:13 160:25
posters 216:3,5 220:18,20
                                   225:24 242:3 250:12 251:9,15
postgraduate 20:19 21:2
                                   282:2,15 302:8,21 303:4,17
                                   307:18 310:16,19 336:9 339:15
posting 48:9 63:9 258:18 265:3
                                   343:17 344:17 356:13,19
posts 5:7 346:21
potential 95:7 96:10,19 97:20
                                   364:16
potentially 96:4 111:6 115:19
                                 Presidential 156:3
 131:12 139:9,23 141:8 175:5
```

```
procedures 115:9
presidents 143:4
press 144:6, 13, 15, 18, 19, 21
                                  proceed 22:21
 145:5,15,16 381:2,7
                                  proceeds 47:18
Pressconnects 145:2
                                  process 53:17,19 66:22 68:22
pressure 268:24
                                   114:25 147:18 199:7,13 200:3
Preston 4:24 30:21,22,24 31:20
                                   200:7,19,23 201:4 341:5 366:4
                                  produce 194:2
 38:16 39:9 91:2 117:5,7,11,16
 127:5,6 141:8 175:24,25 176:5
                                  produced 45:8
 188:17 191:24,25,25 192:7
                                  production 165:6,8
 231:6 233:3,3 234:5 252:22
                                  professors 235:25 236:6,24
 253:4 277:18 317:25
                                   237:6,11
Preston's 31:3
                                  program 153:15 306:2
presumably 39:8
                                  progressive1:11 169:17 172:14
pretending 234:19
                                   172:16 224:18 276:18,24
pretty 34:5 44:5 76:8 194:16,17
                                   294:24 296:6,14
 195:3,5 301:18 379:3
                                  Progressive's 268:5
prevent8:25 51:10 285:15
                                  Progressives 1:11 171:14, 16, 23
 287:14,19 293:19 294:4,8,11
                                   172:20 173:6,13 205:5,22
 296:20 331:17 341:18 342:3
                                   220:23,25 228:6 238:20 265:2
prevented 68:24 72:15 228:11
                                   267:15 268:14 271:7 274:3,6
previous 57:18 111:17 125:15
                                   274:10 276:5,10 277:5,14
                                   284:22 286:2,11 294:19,23
 137:11 143:4 201:7 203:11
 233:5,6 307:5
                                   295:16 323:3 357:3
previously 49:11 56:9 57:17
                                  project 338:17,20
 140:15 178:2 199:19 202:17,20
                                  promote 47:20 192:17,21 210:13
 204:14 207:8 229:5,25 316:13
                                   236:6 309:11,24 310:24
 364:21
                                  promoting 193:12
price 97:20 307:12
                                  promotion 64:19
primarily 48:7
                                  promptly 282:13
principals 48:12
                                  pronounce 40:13
principles 47:20 100:17 192:21
                                  proper 337:5 340:17
 192:22 193:2
                                  proportion 212:5
prior 26:16 36:6,12 130:21
                                  proposal 364:23
 176:12 206:24 208:3 210:9
                                  protect 289:5 352:22
 214:24 283:22 291:21 292:12
                                  protecting 224:14
 292:13,17 312:11 365:24 376:7
                                  protective 295:17 296:20
                                  protest 198:5, 9 205:21 219:16
private 140:25 265:7 353:5
                                   222:15,18 268:22
 354:10
                                  protested 205:5 221:15,21
                                   238:19 239:7
privileged 44:23
                                  protesters 89:14 223:9 224:25
pro 192:25 272:2
pro-choice 245:22
                                   268:21 272:12 275:8,17 290:9
probably 79:3 80:7 88:6 97:7
                                   290:12 326:4 334:4
 137:25 138:3 215:23 220:11
                                  protesting 239:22
 236:6 240:15 241:13 313:5
                                  protestors 168:3
problem 219:24 309:3 315:5
                                  protests 218:8 229:12 349:5,8
 370:23
                                  provide 8:11 31:6 40:8,16 41:11
problems 378:23
                                   43:8 45:7 138:5,9,10,12
procedure 6:5 8:11 376:7
                                   289:17
```

```
quick 151:14 185:18 273:16
provided 29:25 53:14 131:13
 274:5 289:13 291:9 314:13
                                   300:15 379:24
 383:12
                                 quickly 152:5 270:13 295:3
provides 135:25 364:3
                                   334:9
providing 164:18 268:6 282:15
                                 quite 214:5 287:24
provision 370:24
                                 quoted 364:21
proximity 196:14 208:7
                                                 R
public 6:12 168:24 265:6,16
 382:11 384:9
                                 R3:2,9
                                 R-A-J103:4
publication 338:22 378:3,4,6
published 378:12
                                 R-E-I-N 32:4
                                 racial 285:6
punishment 349:15
purchased 180:23
                                 radio 350:3
                                 rainbow 246:9,16
purple 233:15
                                 rainbows 246:15
purpose 47:19 48:7 100:14 179:9
                                 raise 7:4
 179:11 180:13 192:18 310:21
                                 raised109:18 110:2 112:14
 310:22,23 312:4,8
                                 raising 372:19
purposes 314:20
                                 Raj 3:13 5:2 90:13 103:3,4,18
pursuant 6:6 8:10 285:14 297:13
                                   103:20,21 104:5,9 105:14,17
 313:10
                                   106:3,9 107:19 108:6 133:19
put 11:10 21:23 42:23 45:14
                                   134:6,8 135:5,16 136:3 137:9
 47:8 57:18 84:18 92:15 99:6
                                   137:10 140:12 210:11,25
 110:4,6 132:8,9 154:19 182:17
                                   229:24 230:18,23 232:5 233:14
 194:17 248:18 249:8 250:8,9
                                   235:15 238:11,18 240:4,13
 258:21 260:10,10 300:24 301:3
                                   254:24 255:5 256:9,16 260:8,9
 312:20 314:10 322:19 330:8,12
                                   260:10 280:13,14,14 318:11
 346:21
putting 13:6
                                   354:23,24
                                 ran 56:8 185:4,13,14 186:3,4
                                   210:25 298:5
                                 Ranch 92:8,11
Q.R179:12 309:25
quel1 280:15
                                 range 231:11,25
question 9:15 11:23 22:4 24:7
                                 ranges 97:20
 62:6,6 70:7 71:8 106:7 116:5
                                 re-mark 163:22
 116:8 119:20 171:5 184:15
                                 re-marked 164:19
 206:22 207:24 221:17 244:19
                                 reach 96:22,23 162:20,23 176:13
 251:18,20,24 254:12 262:9
                                   214:14 215:3 216:18 219:10
 263:24 284:6 287:16 322:17
                                 reached 61:9 97:4 99:6,8 162:20
 341:25 345:23 350:5,5 361:10
                                   162:22,25 305:15,22
                                 read 6:10 23:2,9,13 46:3,12
 361:11
question-and-answer 282:20
                                   47:18 48:13 64:5,20 129:10,16
 283:10
                                   134:6,10 136:3 140:20 144:25
question-and-answers 283:9
                                   147:2 155:11 156:6 157:19
questionnaire 134:7,14,14,16,19
                                   163:16 167:7 169:12 177:16
 134:22,24 135:19 136:8,11
                                   178:5,19 184:5 199:2 207:7
 137:11 138:17 140:15
                                   217:3 221:3 224:12,18 231:14
questions 6:8 8:4,21 9:4,9
                                   236:16 253:18 265:7 266:8,18
 106:19 136:2 139:13 143:2
                                   268:10 273:18 274:11 281:12
 235:6 282:20 283:7 306:7
                                   282:9,23 284:8,8,18,19 285:17
 340:19 342:9 361:6 379:21
                                   285:20 288:20 294:16,25
```

```
297:16 333:19 337:7 338:21
                                   193:24 194:12 205:4 210:5
 340:20 347:12 349:21 352:5,12
                                   212:18 217:7 226:17 227:8
 353:9 357:7 379:4 382:3 384:8
                                   234:18 239:17 240:9,24 243:14
readable 173:19
                                   243:18 245:13 251:7 252:17
readily 266:15,16
                                   263:20 272:6 279:23 283:24
                                   331:24 365:19 371:6 377:10
reading 122:8 147:20 324:7
 363:7 371:2
                                 recom 102:22
reads 46:4 64:15 166:22 233:14
                                 recommend 153:4
 270:21 271:16 273:11,25 281:8
                                 record 7:12,15 8:8 9:4,10 11:10
                                   18:12 30:6 35:23 45:14 46:4
 336:20 340:13 347:8 352:20
ready 31:10,11
                                   47:19 64:5 75:23 100:7,8
Reagan 92:8 236:10
                                   102:9 106:3 113:2 116:9 133:2
Reagan's 92:11
                                   146:5,7,8,10 147:3 148:6,11
really 39:15 153:2 247:10 267:9
                                   175:12 178:19 199:3 224:12
                                   243:4,6,9 270:14 282:9 300:18
 374:18
reason 8:3 94:25 123:19,21
                                   312:21 314:20 315:2,3,6,7,8
                                   320:15 322:20 348:24 352:5
 128:5
reasonable 220:19 234:14
                                   357:22 360:11 381:16,17 382:4
reasonably 356:24
                                   383:10
                                 recorded 31:12 306:18 352:16
rec 153:3
recall 49:15 58:25 59:21 218:10
                                   359:12 360:8
 219:5,9,13 220:7 229:22
                                 recording 8:24 35:11, 19, 20, 21
                                   257:15 275:25 357:20 358:7,22
 232:18 247:16 258:24 265:18
                                   358:24 360:12
 275:18,20,22,24 278:25 284:9
 284:16 293:23 298:2 299:9
                                 records 4:10 35:10 51:23 59:18
 300:13 301:12,22 303:12
                                   66:3,7 104:22 111:7 112:19,22
 307:10 308:5 336:18 364:14
                                   113:4,9 116:12 135:9 308:4
 376:8,9 377:19,20 378:9,19
                                   356:9,16
recalls 205:5
                                 recruitment 64:19
receipt 117:18 118:3
                                 red 316:9,10 317:13,17 319:21
receive 37:13,19,21 103:3,5,15
                                   319:21 325:20
 139:14 176:16 216:7 236:21
                                 red-haired 317:16
 238:14,23 239:9 339:23 340:2
                                 Redirect 3:6 379:22
received 128:2 158:7 216:13
                                 Reed 61:9,9,15 75:2,5,10 351:15
 232:5 238:8 364:15
                                 ref 151:17 340:12
recipient 127:22 153:25 157:14
                                 refer 36:9 64:3 93:8 140:23
 345:12
                                   144:13 165:25 170:3 281:14
                                   348:23 372:5 373:10
recipients 153:7,23
reclaimed 363:23
                                 reference 265:22 357:22
                                 referenced 34:2 155:19 263:8
recognition 371:25
recognize 21:19 102:20,22
                                   311:11 342:25 357:24
 116:17 117:23 127:10,12
                                 references 48:18 63:9,24 270:19
 133:13 148:10 152:25 165:14
                                   370:23 373:13
 174:2 230:12 244:20 249:23
                                 referencing 151:18 372:6
 276:15,17,20,25 277:4,7
                                 referred 36:7 107:8 139:17
 293:11 318:22 319:17 323:2
                                   155:14 169:14 337:17 343:12
                                 referring 11:19 132:13 135:11
 359:2
recognized 310:12,15
                                   165:18 166:4 167:10,11 170:8
recollection 60:3 71:24 116:2
                                   170:10 207:6,19 228:16 298:24
 176:19,21 178:19 190:15
                                   299:2 309:21
```

```
refers 140:24 169:12 353:22
 373:17
reform 338:17,20
reforms 338:25
refresh 99:20 178:18 212:18
 240:8,23 243:13,18 245:12
refreshes 116:2
regarding 35:11 53:23 59:19
 61:6,22 66:3 99:3 106:7,24
 107:7 149:16 150:6 160:19,22
 161:4 170:14,22 172:18 173:4
 178:23 218:5 235:25 236:3,13
 250:2 258:9,21 292:16 312:8
 347:15 356:9,16 362:24 374:11
 378:24
regards 66:20 161:6 176:9 337:5
 340:16
Regents 14:12
reger 129:21
register 13:2 130:6
registered 46:6 52:21
registration 13:3 129:7,15,18
 129:22 130:2,13
regular 33:24 35:10 211:18
 212:12,13
regularity 34:10 54:5
regularly 64:13
regulations 224:15
Reid 352:9
reign 30:16
Rein 32:3, 6, 16, 18 38:4, 7, 16
 39:11,14 52:7,8 74:11,17 98:6
Rein's 32:10,13
reins 34:4
reinstate 363:6,15
related 149:9,13 236:25
relating 372:14
relationship 172:8
relayed 263:20
released 306:15
relevant 284:4
relieve 268:24
rem 124:7
remarks 282:19
remem 291:24
remember 9:19 16:5 22:16 25:25
 28:20,23,25 30:20 34:8,12
 35:7 37:3 39:20 40:5,12 41:16
 41:17 49:16 50:13 51:20 53:4
 53:5,10,13,21 54:10 57:10
```

```
58:9,19,20 59:13,16 63:17
65:5,7,14 66:5,9,14,17,23
67:2,7,10,15,22 68:2,4,18,22
69:4,15,20 70:2 72:4,6 78:11
80:5 81:15,17 83:12 84:7,11
88:12,19,21,23 90:21 91:4
92:19 93:19 97:3,7,8 98:16,22
98:25 100:22 102:3 103:19
104:7,21 105:3 106:11,18
107:12 109:3,18 110:17,23
111:16,22 112:3,24,24 113:11
113:18 115:2,3,11,19 117:9,10
117:12 119:6,11 120:3 121:6
121:11,16 123:9,22 124:13
126:11,22,24 127:3 128:4,12
129:23 131:11 134:23,24
136:16,17,20 137:3 138:18,22
138:23 139:6 141:12,23 142:6
142:9,14,18,20 143:12,19,22
143:22,23 149:4,6,14,15,20
150:19,21 153:4 156:22,24
158:9,15,17,18,19,21 159:7
160:10,23 161:21 163:13
165:23 167:25 168:24 169:7
174:11,12,16,25 175:5,7 176:4
176:6 177:5 178:15 181:5,20
182:8,24 185:3 186:11,13,19
188:21 189:2,5 190:6,14,17,21
191:7,13 192:3,5 193:20,21,23
194:15,20,22,24 195:17,20,21
195:25 196:10,15,23,24 197:3
197:6,9,10 198:8,18 199:10,11
201:23 202:2,4,5,8,11,23,25
204:4,9 205:25 206:9,10,14
208:9 209:15,16 210:19 213:6
213:10 215:24 216:9,20,21
217:15 219:8 220:10,13,14
222:20,21 223:3,20 225:10,19
226:15,21 227:5,13,17,22
228:6,14,25 231:7 234:8 237:7
237:13 241:7,14 245:5,18
250:7,22,23 251:3 252:4,21
253:6,25 254:2 255:2,11,21,23
255:24 256:8,25 257:11,12
258:2,7,12,13,23 259:8,9,14
259:22,23 260:6,8,19 261:5,11
265:11,12,15,19,20,24,25
266:4,21,23 267:11,14,20,21
267:24 268:23 271:11,23,24,25
272:13 273:2,6 274:15,20,23
```

```
50:7 54:4,13 55:12 62:16,19
 275:4 276:17 277:6,25 278:5
 278:15 279:13,22,25 280:6,13
                                  72:10 76:4 88:17 89:15 90:23
 280:16,18,22 281:3,6,15,20
                                  157:15 158:4 160:3 168:20
 282:7 283:14 286:20 287:7,23
                                  190:4 291:14 336:6 352:6
 288:6,10,12,13 289:10,11,12
                                  353:19
 289:19,21,25 290:2,3,6,10,16
                                 Republican's 159:14 340:3 343:7
 290:17,18 291:2,5,10,11,15,18
                                  360:3 376:18 384:4
 291:19,22 292:2,3,8,9,15,19
                                 Republicans 1:6 11:12,14,19
 292:21 293:3,6,9,22 294:2,6
                                  12:4 18:3 21:24 22:24 24:4,5
 294:10,13 295:6,10 296:3,15
                                  24:20 25:15 26:6 27:3 28:2
 296:24,24 297:8,20,23 298:17
                                  31:2 33:25 35:17 36:13,25
 298:21 299:17 300:23 301:8,17
                                  37:4,11,15,23 38:2,17 41:19
 305:14,21,23 306:5,19 307:4,4
                                  42:5,8,9,14 43:14 46:5,6,18
 307:14,24 309:4 310:4,14,18
                                  47:6,19 48:7,21,24 50:12,16
 311:20,24 312:7,9,12 320:23
                                  50:20 51:14,24 52:9 58:18
 329:12 330:20,21 331:2,23
                                  60:7,14,23 61:7,23 62:7 63:14
 332:18,22 333:3 334:5,8,13
                                  63:15,20 64:13,23,24 69:4
 335:2,9,10,17,21,25 336:12,15
                                  70:5,12,20,22 71:13,15 72:21
 341:3,4 342:14 347:2 348:2,3
                                  73:10 74:23 77:12 79:4 81:8
 348:4,7 349:25 359:14 364:11
                                  82:21 88:11 89:22 95:12 97:2
 364:13 369:20,21 378:10,14,16
                                  100:17,20,24 101:2 105:5,9
 378:17,18 379:2,4,10,10
                                  106:23 107:20 110:6 114:13
remembers 113:2
                                  130:25 131:23 136:21,22,24
                                  139:3 141:9,11,17 154:5,14
remind 96:6 159:10
remove 266:16 297:15
                                  155:9 156:16,20 157:10,17
removed 300:2,9
                                  158:7,11,12,20 159:5 166:24
removing 267:22
                                  177:20,23 178:3,20 187:20,24
rep 52:6 209:22 215:6
                                  188:12 190:9 191:5,23 196:19
repeat 70:7 221:17 251:18,19
                                  199:20 200:15,22 202:17,19,24
                                  204:7 207:9 208:15,24 209:3,8
 287:16 345:23 347:21
                                  210:8,9 212:22 213:2,18,22
rephrase 262:9 368:8
reply 235:12
                                  220:24 221:11 224:14,17 225:2
                                  225:24 227:16 228:2,23 230:15
Reported 1:24
Reporter 7:4,11,14 54:20 100:7
                                  231:3 232:12,21,25 238:18
 146:7,10 251:21 312:22 313:17
                                  239:25 247:6 250:12,25 251:5
 315:5,8,24 316:3 328:10 345:7
                                  251:14,15 252:12,19 253:15
 381:15 383:14
                                  258:6 259:17,18,20 262:18
                                  264:23 265:5 266:10 277:17
Reporters 383:11 384:2
reports 338:23
                                  278:3 279:9 281:16 282:3,15
                                  288:18 293:20 294:8 298:25
represent 151:20
representation 231:24
                                  299:3,16,22 300:24 303:7
representative 169:6,8 170:16
                                  304:3,24 305:4,8 306:18 307:7
 170:24 171:8 172:20 173:6,13
                                  307:15,25 308:4,15 324:21
 228:8 243:25 244:23 352:10
                                  325:9 329:8 331:6 332:24
                                  333:5 336:7,22 337:2 339:20
representatives 169:2 176:10
representing 7:21 83:17 85:24
                                  340:14 341:6 342:3 343:17,19
 86:22 131:14 343:20 361:5
                                  345:20,21 346:2,3,8,9,19
                                  349:19 350:18 351:7,16 356:8
reps 189:8
republican 5:2 24:17 32:22
                                  356:13 357:10 362:25 363:18
 43:12 47:21,23,25 48:4,5,12
                                  363:20 364:15 365:4,6 369:18
```

```
375:16,22 376:6,17,25 380:7
                                 restaurant 144:4 238:7
 380:12,16
                                 restored 47:10 352:2
Republicans' 208:7 247:18
                                 restrain 294:21 326:3
 349:17,24 350:6,11,14
                                 restraining 326:23
request 30:6 43:13 78:17 106:2
                                 restroom 146:3 270:11
 113:3 118:5,8 120:14 121:24
                                 restuccia 1:1,17 2:1 3:1,3 4:1
 122:3,6,11 123:13,17,20,24
                                  4:22,24 5:1 6:1 7:1,9,10,13
 125:11,15 131:19 132:2 135:9
                                  7:19 8:1 9:1,25 10:1 11:1
                                  12:1 13:1 14:1 15:1 16:1 17:1
 139:25 149:23 152:6,15,19
 213:25 236:13 284:3 308:20
                                  18:1 19:1 20:1 21:1 22:1 23:1
                                  24:1 25:1 26:1 27:1 28:1 29:1
 310:8 364:10 366:6 369:18
requested 82:12 120:17 125:21
                                  30:1 31:1 32:1 33:1 34:1 35:1
requester's 122:12
                                  36:1 37:1 38:1 39:1 40:1 41:1
                                  42:1 43:1 44:1 45:1,17 46:1
requesting 45:15 150:24 152:15
 159:18
                                  47:1 48:1 49:1 50:1 51:1 52:1
                                  53:1 54:1 55:1 56:1 57:1 58:1
requests 3:10, 11, 12, 14, 15, 16, 17
                                  59:1 60:1 61:1 62:1 63:1 64:1
 3:18,19,20,21,22 59:25 118:10
 118:12 122:22 150:20 368:11
                                  65:1 66:1 67:1 68:1 69:1 70:1
 369:10
                                  71:1 72:1 73:1 74:1 75:1 76:1
require 129:21 130:9,11,15
                                  77:1 78:1 79:1 80:1 81:1 82:1
 349:2
                                  83:1 84:1 85:1 86:1 87:1 88:1
                                  89:1 90:1 91:1 92:1 93:1 94:1
required 115:6,9 130:2,13 159:8
 224:15 347:9,24
                                  95:1 96:1 97:1 98:1 99:1
requirement 66:18
                                  100:1 101:1 102:1 103:1 104:1
                                  105:1 106:1,13 107:1 108:1
requirements 372:19
                                  109:1 110:1 111:1 112:1 113:1
researched 157:11
reservation 4:15 5:11 35:6 66:7
                                  114:1 115:1 116:1 117:1 118:1
 66:16,19 120:5 121:21 124:20
                                  119:1 120:1 121:1 122:1,14
 128:18 146:15 147:15 238:23
                                  123:1 124:1 125:1 126:1 127:1
 366:11,19,20 367:20
                                  128:1 129:1 130:1 131:1 132:1
reservations 368:11
                                  133:1,16 134:1 135:1 136:1
reserve 35:3 66:16 67:16 95:7
                                  137:1,13 138:1 139:1 140:1
 106:19 139:12 201:15,18
                                  141:1 142:1 143:1 144:1 145:1
 226:23 253:4 303:9,13 368:2
                                  146:1 147:1 148:1 149:1 150:1
reserved 6:9 35:7 67:6,20 68:12
                                  151:1 152:1 153:1 154:1 155:1
 68:15 69:17 95:8 120:11,22
                                  156:1 157:1 158:1 159:1 160:1
 226:19 227:4 252:8,9
                                  161:1 162:1 163:1 164:1 165:1
                                  166:1 167:1 168:1 169:1 170:1
reserving 147:19,23 160:15
 205:6 251:12,13 252:18
                                  171:1 172:1 173:1 174:1 175:1
respect 94:4 251:12 368:10
                                  176:1 177:1 178:1 179:1 180:1
                                  181:1 182:1 183:1 184:1 185:1
respective 6:4
respond 177:3 346:19
                                  186:1 187:1 188:1 189:1 190:1
                                  191:1 192:1 193:1 194:1 195:1
responded 342:10
                                  196:1 197:1 198:1 199:1 200:1
responding 239:12
responds 239:3
                                  201:1 202:1 203:1 204:1 205:1
                                  206:1 207:1 208:1 209:1 210:1
response 150:12 288:20 361:17
responses 313:13 346:25
                                  211:1 212:1 213:1 214:1 215:1
                                  216:1 217:1 218:1 219:1 220:1
responsiveness 6:8
rest 21:8,16 60:23 95:10 109:25
                                  221:1 222:1 223:1 224:1 225:1
 156:24 163:12 278:5 332:19
                                  226:1 227:1 228:1 229:1 230:1
```

```
230:24 231:1 232:1 233:1,22
                                 reveal 106:20
 234:1,7,15,20 235:1 236:1
                                 revealed 26:16
 237:1 238:1,24 239:1 240:1
                                 revert 303:13
 241:1 242:1 243:1,8 244:1
                                 review 8:9 22:5 44:20 45:9
 245:1 246:1 247:1 248:1 249:1
                                   85:12,13 133:6 151:17 175:15
 250:1 251:1 252:1 253:1 254:1
                                   348:23 377:12,25 378:2,9,12
 255:1 256:1 257:1 258:1 259:1
                                   378:24
 260:1 261:1 262:1 263:1 264:1
                                 reviewed 22:12 23:2,24 175:17
 265:1 266:1 267:1 268:1 269:1
                                 reviewing 22:16 117:13
 270:1 271:1 272:1 273:1 274:1
                                 reviews 378:25
 275:1 276:1 277:1 278:1 279:1
                                 revoked 363:20
 280:1 281:1 282:1,14,18 283:1
                                 rewind 327:19
 284:1 285:1 286:1 287:1 288:1
                                 Reynolds 156:23
 289:1 290:1 291:1 292:1 293:1
                                 Riccardi 87:25
 294:1 295:1 296:1 297:1 298:1
                                 rifle 246:14
- 299:1 300:1 301:1 302:1 303:1
                                 right 7:5 9:6 15:15 23:5,21
 304:1 305:1 306:1 307:1 308:1
                                   34:21 37:16 47:7,10 49:20
 309:1 310:1 311:1 312:1 313:1
                                   51:4,9 59:5 61:2 68:6,21
 314:1 315:1 316:1,5 317:1
                                   72:15 78:2 81:6,8 84:17,23
 318:1 319:1 320:1 321:1 322:1
                                  87:24 91:21 93:3 106:19
 323:1 324:1 325:1 326:1 327:1
                                   108:21 119:13 122:11,19,24
 328:1 329:1 330:1 331:1 332:1
                                   126:19 137:17 138:8 139:7,13
 333:1 334:1,2 335:1 336:1
                                   139:25 140:7 145:25 151:11
 337:1 338:1 339:1 340:1 341:1
                                  152:13,18 154:10 155:24 159:9
 342:1 343:1 344:1 345:1 346:1
                                  162:3,19 164:2 166:10 170:10
 347:1 348:1 349:1 350:1 351:1
                                  171:13,21 176:25 177:8 178:25
 352:1 353:1 354:1 355:1 356:1
                                  181:6,11,25 183:5,17 187:14
 357:1 358:1 359:1 360:1 361:1
                                   195:5 196:22,25 197:24 199:16
 362:1 363:1 364:1 365:1 366:1
                                  200:15 201:2 203:4,7 206:2
                                   211:24 217:3 218:4 220:12
 367:1 368:1 369:1 370:1 371:1
 372:1 373:1 374:1 375:1 376:1
                                   221:16,22 222:4,5,10,13 223:7
 377:1 378:1 379:1 380:1 381:1
                                  224:14 225:5 233:16,17,25
                                  240:18,19,21 241:15 242:21
 382:1,3,8 383:1,3 384:1,5,7
Restuccia's 43:17 44:12
                                  243:3 247:2,4 248:8,8 269:4,8
Restuccial 106:14,25
                                  269:10 276:21 278:22 279:6
restuccial@gmail.com 105:8,18
                                  290:19 296:6 301:14 302:18
 106:15 107:7,17 133:22
                                   304:6,22 305:6 311:16,18
retain 362:15
                                  312:25 315:15 316:20 317:20
retained 344:3
                                   317:23 318:19 319:2,5 320:7
retains 362:6
                                  320:14 321:13,19 322:4,5,20
retaliate 375:15,22 380:6,16
                                  322:22,24 323:3,12,17 326:12
retaliated 380:11
                                  327:6,9 328:5,24,25 329:25
retaliation 376:17,24
                                  332:10 340:6 344:20 348:16,19
                                  349:9 360:2 367:14 370:4,12
retreat 92:15
return 165:25 184:2,25 351:6
                                  370:18 371:15 374:14,16
                                  376:20 378:5,7,22 381:4,13
returned 6:15 17:5 37:11 184:21
                                 rights 51:17 271:21 336:24
 192:4
                                 ring 88:2
Retus 7:18
                                 Roger's 139:17
```

```
role 93:4 303:2 375:7
                                  157:1 158:1 159:1 160:1,22
Roman 85:2,2
                                  161:1 162:1 163:1 164:1 165:1
Ronald 92:8 236:10
                                  166:1 167:1 168:1 169:1 170:1
room 18:13 35:3 95:7,9 108:21
                                  170:15 171:1 172:1,19,23
 108:22,25,25 114:21,25 115:3
                                  173:1 174:1 175:1 176:1 177:1
 115:6,10,13,22,23 118:5,8,10
                                  178:1 179:1 180:1 181:1 182:1
 118:12,15,20,21,24 119:7
                                  183:1 184:1 185:1 186:1 187:1
                                  188:1 189:1 190:1 191:1 192:1
 120:10,14,17,22 121:4,12,14
 121:17,24 122:3,6,22 123:13
                                  193:1 194:1 195:1 196:1 197:1
 123:17,20,24 124:3,6,12,15
                                  198:1 199:1 200:1 201:1 202:1
 125:4,11,21,24 126:5,10,21,23
                                  203:1 204:1 205:1 206:1 207:1
 128:16,18 160:15 201:15
                                  208:1 209:1 210:1 211:1 212:1
 205:11 206:4 232:23 234:11
                                  213:1 214:1 215:1 216:1 217:1
 252:8 263:23 264:14,17 267:13
                                  218:1 219:1 220:1 221:1 222:1
 267:15 274:11,21 285:14
                                  223:1 224:1 225:1 226:1 227:1
 297:22 300:9 328:18 329:8
                                  228:1 229:1 230:1 231:1 232:1
 369:10,19 375:23
                                  233:1 234:1 235:1 236:1 237:1
rooms 35:8 47:7,10 108:19
                                  238:1 239:1 240:1 241:1,16
                                  242:1 243:1 244:1 245:1 246:1
 114:22 115:4,13 117:18 141:19
 141:21 147:19 201:5,9 221:2
                                  247:1 248:1 249:1 250:1 251:1
 251:13 252:8,18 303:14 341:5
                                  252:1 253:1 254:1 255:1 256:1
 341:9,10 375:24
                                  257:1 258:1 259:1 260:1 261:1
Rose 1:1, 10 2:1 3:1 4:1 5:1 6:1
                                  262:1,7,11,21 263:1,2,7,10
 7:1,21 8:1 9:1 10:1 11:1 12:1
                                  264:1,2 265:1 266:1 267:1
 13:1 14:1 15:1 16:1 17:1 18:1
                                  268:1 269:1 270:1 271:1 272:1
 19:1 20:1 21:1 22:1 23:1 24:1
                                  273:1 274:1 275:1 276:1 277:1
 25:1 26:1 27:1 28:1 29:1 30:1
                                  278:1 279:1 280:1 281:1 282:1
 31:1 32:1 33:1 34:1 35:1 36:1
                                  283:1 284:1 285:1 286:1 287:1
                                  288:1 289:1 290:1 291:1 292:1
 37:1 38:1 39:1 40:1 41:1 42:1
 43:1 44:1 45:1 46:1 47:1 48:1
                                  293:1 294:1 295:1 296:1 297:1
 49:1 50:1 51:1 52:1 53:1 54:1
                                  298:1 299:1 300:1 301:1 302:1
                                  303:1 304:1 305:1 306:1 307:1
 55:1 56:1 57:1 58:1 59:1 60:1
 61:1 62:1 63:1 64:1 65:1 66:1
                                  308:1 309:1 310:1 311:1 312:1
 67:1 68:1 69:1 70:1 71:1 72:1
                                  313:1 314:1 315:1 316:1 317:1
 73:1 74:1 75:1 76:1 77:1 78:1
                                  318:1 319:1 320:1 321:1 322:1
 79:1 80:1 81:1 82:1 83:1 84:1
                                  323:1 324:1 325:1 326:1 327:1
 85:1 86:1 87:1 88:1 89:1 90:1
                                  328:1 329:1 330:1 331:1 332:1
 91:1 92:1 93:1 94:1 95:1 96:1
                                  333:1 334:1 335:1 336:1,20
 97:1 98:1 99:1 100:1 101:1
                                  337:1 338:1 339:1 340:1 341:1
 102:1 103:1 104:1 105:1 106:1
                                  342:1 343:1 344:1,14 345:1,15
 107:1 108:1 109:1 110:1 111:1
                                  346:1,7 347:1,8 348:1,25
 112:1 113:1 114:1 115:1 116:1
                                  349:1,18 350:1,10,12 351:1
 117:1 118:1 119:1 120:1 121:1
                                  352:1,7,25 353:1 354:1 355:1
 122:1 123:1 124:1 125:1 126:1
                                  356:1,25 357:1 358:1 359:1
 127:1 128:1 129:1 130:1 131:1
                                  360:1 361:1 362:1 363:1 364:1
 132:1 133:1 134:1 135:1 136:1
                                  365:1 366:1 367:1 368:1 369:1
 137:1 138:1 139:1 140:1 141:1
                                  370:1 371:1 372:1 373:1,14,23
 142:1 143:1 144:1 145:1 146:1
                                  374:1 375:1 376:1 377:1 378:1
 147:1 148:1 149:1 150:1 151:1
                                  379:1 380:1,5,15,19 381:1
 152:1 153:1 154:1 155:1 156:1
                                  382:1 383:1 384:1,4
```

```
Rosen 253:18
                                   264:22 269:23 271:6 276:5
rough 212:16
                                   279:8 314:4 343:3 344:17
round 166:5,24
                                   380:3
routes 266:15
                                 Scaganelli 30:22 38:16 126:25
row 272:20,20 284:23 288:19
                                   128:7,11 175:23
                                 Scagneli 4:24
rule 5:13 66:19 146:16 164:25
                                 Scagnelli 30:21,24 62:3 91:2
 165:12 173:23 313:10 314:19
                                   127:5,6 141:8,16 175:24,25
rules 6:5 8:10,16,20 157:13
                                   188:17 191:24 231:6 252:23
 361:7
                                   253:4 277:19 317:25
run 27:7 43:22 52:16 56:18 96:8
                                 Scagnelli's 117:5
 96:24 161:4 185:14
                                 scary 194:9
running 53:4 273:8
                                 scene 88:7 223:23 224:9,13
runs 56:18
                                   227:16
rush 272:3
                                 schedule 34:3 39:15
                                 scheduled 34:7 243:21 274:2
               S
                                 school 14:11,13 15:20 18:12
S3:2,9,9
                                   28:16 38:5 56:8 128:23 129:3
S.A53:11 112:3,8 232:21 310:12
                                   129:13 197:13,17
 339:9,20,22 343:8 344:10,13
                                 screaming 224:2
 344:17 345:21 346:3,9,25
                                 screen 315:14 320:14 321:10,11
 367:15,25 368:12,13 370:6
                                   321:16,17 322:5 328:24 358:17
 374:11,13,20,25 375:7 377:8
                                 screens 315:12
S.A.'s 342:17 360:20
                                 screenshot 151:25
sa 112:10
                                 scroll 152:9,10
safe 220:2 222:15 225:21 226:2
                                 search 3:12 105:16 106:3,13
 226:5,6 269:6 308:6,8
                                   107:3,4 150:6 152:16 186:9
safely 332:15
                                 searches 132:6
Saitta 2:21 3:5 21:11,14 344:25
                                 searching 284:3
 345:8 360:18,21,25 361:3,4
                                 seats 279:11
 381:17
                                 Sebastian 85:2,2
Saratoga 31:21,22
                                 second 42:2 120:4 164:13,13
sat 23:9 169:3
                                   192:25 220:17 267:25 268:3
save 282:19
                                   272:20 284:23 302:10 314:3
saw 82:3 206:8 320:21 330:14,17
                                   315:2,4 333:22 342:23 362:4,5
 331:5 341:22
                                   368:20 375:11
saying 9:7 185:17,24 226:16
                                 seconds 284:21 315:19,21
 231:2 330:7,21,22 331:3
                                 secretary 28:6,21 30:9 83:2
says 46:9 64:2,11,11,12 103:10
                                 secretaryship 30:16
 118:4 119:2 120:17 124:16
                                 section 368:19
 126:13 128:14 129:11 134:6
                                 secure 109:14 115:6,9,13
 135:18 137:21 140:14 143:24
                                 security 161:21,24 163:5 176:11
 144:3 148:18 151:25 153:7,11
                                   254:19 255:7 264:15 265:13
 155:6,25 156:15 157:6 170:4
                                   271:4 322:10 335:23 336:4
 174:18,19 176:8 178:20 199:3
                                   353:6 354:10
 199:16,18,23 202:16 207:7
                                 see 43:7 50:2 63:11 99:15,20
 217:5 220:22 224:12 230:23,24
                                   116:2,22 118:5 120:11,23
 232:21 234:10 235:23 236:12
                                   127:19 131:8 134:4,15 144:23
 238:5,18 239:6,21 245:22
                                   152:12 154:23 155:11 163:18
 246:5 259:16 261:8,14 262:17
                                   166:18 169:12 175:19 176:14
```

```
179:15 206:6 214:6,13 216:16
                                 sentence 363:10
 220:8 246:7,25 247:2,10
                                 separate 203:4
 262:21 273:11 281:22 290:22
                                  separately 237:21
 300:11 314:3,6,7 316:5,8,15
                                 September 4:12 121:21 133:7
 317:18 318:4,10,11,13,15
                                   134:5 215:22
 319:12,15 320:8,12,16,20,22
                                 series 4:12 133:6 238:11 361:6
 321:2,2,9,11,13,14,15,19,20
                                   366:16
 321:21,22 322:7,9,10,14,21,23
                                 server 213:23
 323:7,11,24 324:6,12 325:11
                                 service 42:3,22 115:3
 325:15,18,22,23 326:6,12,25
                                 serviced 48:5
 327:9,11 328:16,24 329:19
                                 set 51:17 88:14 109:21 160:8
 342:24 343:6 344:14,20 345:9
                                   178:14,16 179:7 188:25 190:16
 345:14,15,17 348:2 358:16
                                   190:18 192:20 206:21 208:7
 366:17 367:10 368:24,25 370:2
                                   213:7 216:22 247:14 380:4
 370:25 371:4 375:17
                                 setting 64:17 89:5 207:19 230:2
seeing 137:18 265:24 297:23
                                 settings 129:16
seen 22:10,10,11 82:16 84:25
                                 settle 108:8
 250:3 313:12,24 358:19 362:13
                                 settled 108:15
 367:7
                                 setup 181:11 188:19,22 232:16
select 83:3
                                 seven 4:18,19 10:18 20:17 74:15
selected 114:22 115:2
                                   74:16 76:23 129:12 140:17
selecting 114:25
                                   157:8,23 159:25 163:15 164:19
                                   177:17 235:2 281:7 282:14
semester 17:11 18:2,11,15,18
 20:9 25:11,13 26:14 28:10
                                   315:18,21 317:9 318:19 319:2
 29:3 33:17 34:3 36:24 43:15
                                   320:7,15 323:14,15,20 324:14
 43:19 49:24 50:6 54:7 56:12
                                   324:21 325:9,12 326:2 327:2
 56:24 57:8 59:3 60:15,23 61:3
                                   328:2,8,14 329:4,9 330:6
 68:8 74:6 75:8 76:11 205:20
                                   353:3,3,12
 211:21 302:13,14,17 307:19
                                 seventeen 5:16 123:11 125:16
 336:8 342:4 350:25 372:9
                                   244:14,16 353:3,12
semesters 302:13,23
                                 seventy 45:22 47:17 374:2
send 40:21,25 42:11,13 117:7
                                 seventy-eight 264:19,22
 134:7,24 136:5 140:15,19
                                 seventy-nine 264:19 265:4
 149:3,8,8,11,12,19 157:7,23
                                 seventy-seven 253:9 256:11
 158:3 210:17 213:14 215:15,25
                                   257:22,25 259:5 263:9 374:17
 216:2 232:23 233:21,22 238:24
                                 shaking 9:6
 239:23 249:10 258:9 283:21
                                 share 64:20
 292:16 314:10 346:14
                                 sheet 382:7
sending 215:6 216:4 221:2
                                 shirt 316:9
 230:20 231:4 235:18
                                 shirts 320:19
sense 19:11 45:6,10
                                 shooting 197:13,17
sensitive 135:21
                                 short 94:13 95:4 99:23 146:3
sent 43:14 114:5 117:4,11
                                   214:20 262:2
 133:16,17 134:18,25 135:5
                                 shorter 317:22
 137:13 148:12,21 149:5,6
                                 Shortest 183:16
 152:18 175:22 176:4 216:10,12
                                 shorthand 93:7
 216:12 232:4 234:15 238:11
                                 shortly 301:18
 243:25 283:15,19 336:25
                                 shou 284:23
 339:12,19 341:14 367:8 369:21
                                 shouted 206:11,13
```

```
shouting 224:2 255:17 284:23
                                 sitting 18:13 183:8 288:18
 286:16 299:11,18
                                 situation 9:16
show 36:18 51:24 87:10 102:5
                                 situations 305:13 363:13
 115:25 127:4,8 132:19 145:22
                                 six 4:16 10:18 39:14 73:5 74:15
 146:12 148:5 230:7 244:8
                                   74:16 76:23 147:6 148:6
 288:14 313:9,22 314:8 337:19
                                   248:12 278:2 319:2 320:16
 342:15 358:13
                                   325:9
showed 39:13,14 58:19 91:13
                                 sixteen 5:14 121:19 165:25
 201:8 205:12 221:9 239:21
                                   166:4,20 233:12,22 243:10
 240:4 281:19,21 303:24 332:20
                                   294:17,22 337:22
 359:23
                                 sixty 249:21 376:21 379:17
showing 249:15
                                 size 108:23 279:10 281:8
sic 30:23 33:4 38:16 113:2
                                 skills 48:3
 127:2 128:7,11 175:23 241:6
                                 skinned 321:22
 354:23
                                 slavery 285:7
side 104:2 196:12,16 247:2
                                 slider 285:2
 295:20 322:5 329:8
                                 slightly 73:6
sight 241:16 242:3,14,17
                                 small 247:7
sign 6:11 8:9 42:11 50:2 137:4
                                 smaller 36:19
 233:25 234:7 238:24 239:8,13
                                 Smith 238:10
 246:13 289:2 293:25 294:4
                                 snow 245:3
 325:3 384:8,10
                                 snuck 295:20
                                 social 41:22 80:6 258:8,9,14
signage 220:5
signature 384:11
                                   264:24 309:17,18,20,23 351:10
signed 6:14 136:13,15 160:9
                                 socialism 3:22 36:21 49:5,10
 167:4 238:9 384:25
                                   56:19 58:7,10,12,15 72:13
signing 234:3
                                   163:2,4 167:12 174:24 214:6
signs 48:10 63:9,16,21 193:17
                                   219:15,25 309:3,3,6,10,22
 193:18,19,25 194:3 197:7,8,10
 206:8,16,17 220:9,10 245:14
                                 socialist 163:7
 245:15,20 246:7 288:19,24,25
                                 Societies 115:15
 289:14,17,24 290:5,7,14,23,25
                                 society 115:18,20 141:18,22,24
 291:8,14,21 292:12,17 293:21
                                   243:22,24
 294:9,12 300:23 301:3 311:19
                                 somebody 37:23 115:21 136:22
 311:21 312:4,8 318:5,9 319:14
                                   223:16 312:2
 324:22 325:10 328:16
                                 someone's 44:9
Silverman 91:9,11
                                 soon 45:6 135:19 227:10 285:10
                                   343:4
similar 92:21 286:16 356:23
similarly 100:16
                                 soph 302:9
simple 184:15
                                 sophomore 25:4 27:19 95:22
sincere 155:7
                                   302:7,9
                                 sorry 21:11 90:18 127:6 135:17
single 27:5
sir21:20 133:11 146:12 164:18
                                   137:16 138:10 147:5 165:5
 165:15 176:16 178:5 353:9
                                   166:13,15 238:25 262:9 296:5
sister 10:25
                                   313:20 338:12 366:23 372:24
sit23:12 88:10 148:2 151:12
                                 sort 89:5 97:22 134:2 154:13
 194:12 237:7 286:25 288:12
                                   161:10 172:8 192:11 220:5
 292:2,3 295:13 343:6
                                   246:16 247:2 281:4 308:15
site 220:6 318:16
                                   320:15 331:17
```

```
154:21 155:15 178:15 181:20
sound 242:24 319:7
Soundbites 55:7 87:14 305:24
                                   182:25 185:3 188:21 197:9
 311:12,13
                                  204:16 207:3 220:13 227:12
sounded 71:2 359:4,5
                                   240:2 250:7 252:5 255:11,21
                                  255:23,24 261:16 264:3 266:20
sounds 81:6 118:23 178:25
 181:24 220:19
                                   266:22,23 271:11 279:22
source 111:14 190:22
                                   286:15 295:6 299:21 307:25
                                  322:14,21 371:14,17 379:13
space 66:16,19 108:22,25,25
 115:16 147:19 226:19,23 227:4
                                 specifics 109:3 153:4 174:11
 308:3,7
                                   223:20 227:13
spaces 115:16
                                 speech 51:22 87:10 160:16,18
                                  224:15,16 275:3,8,17 285:14
SPALDING 2:4
sparse 38:13
                                  285:19 288:19,25 289:3,14,24
                                  290:13,14 292:11,17 293:20
sparsely 78:12
speak 66:25 73:13,15 80:14
                                  294:4,9,12 295:9 297:14 301:4
 81:21 82:2 83:18 85:25 99:15
                                   311:7,14,19,21 312:4,8 319:14
 119:10,22 120:25 122:7 123:5
                                  324:22 325:3,10 328:15 352:22
 154:7 159:16 176:10 205:7
                                   357:2 369:11,19 373:13,16,22
 225:18 236:3 287:22,24 295:7
                                   374:19 375:3,6,8 377:12 378:6
 298:3 304:23 305:4 307:13
                                  381:10
                                 spell 39:24
 323:19 350:8,12
speaker 3:17 36:18 58:21,22
                                 Spelled 56:14
 59:8 60:7 72:13 73:10 74:21
                                 spelling 52:6 54:15,18 56:7
                                   75:22 81:6 359:15
 75:8,11 86:12 93:17 94:4,8,15
 96:4,11 104:17 108:9,11
                                 Spencer 41:3 141:8
 109:15 114:22 115:10 130:19
                                 Spencer's 40:5
 135:24 137:7,12,16,17,21
                                 spent 110:19,21 114:6 181:2
 139:16,22 206:13 260:17 273:5
                                 spine 65:21,22,23 177:22 178:9
 273:7,9 296:25 297:6 324:15
                                  178:11,21 183:2,6 185:25
 325:13 326:5,15 327:15
                                  196:13,16 199:8 202:21 203:6
speaker's 109:13
                                  203:23 204:8,15,16,17,23
speakerphone 260:11
                                  209:9 223:17 224:17 228:3
speakers 36:19 48:11 54:8,11
                                  247:15 365:24
 55:9,19 56:4,11 57:7 59:20,22
                                 spoke 70:21 75:5 76:22 78:25
 70:22 71:3,15,20,23 72:6,16
                                  87:3 119:12,14 125:2,4 126:19
                                  126:21 294:19 305:3 319:9
 72:20 75:14,15 92:13 96:14
 97:13,20 167:13,17,19 168:11
                                  374:11,13
 206:11 336:17 356:23 357:10
                                 spoken 307:9
speaking 23:8 86:18 92:13
                                 sponsor 372:20 373:6
 124:17 126:14 156:2,5,9,13
                                 spontaneously 291:17
 318:25 320:6 323:17 324:18,19
                                 sporadic 211:16
 351:8 374:6
                                 sporadically 39:13
specific 42:23 82:24 112:25
                                 spree 373:16
 115:20 141:23 200:17 220:19
                                 spring 15:7 16:9,14,17 17:18
 225:19 252:16 256:20 261:11
                                  18:5,8 19:6,8,9,14 36:23
 304:21 336:15 339:3 349:4
                                  48:22 50:5,7,14 65:11 71:6
                                  75:11 76:16 77:24 78:3 93:25
specifically 88:23 95:10 102:22
 113:18 119:11 121:16 123:22
                                  94:2
 126:8,23 127:13 130:8 131:12
                                 Springs 31:21
 133:15 139:4 142:19 149:5,14
```

```
St14:15,22 15:10,18
                                   262:7,11,21,25 264:7 292:22
staff 367:17 368:15 369:15
                                   336:20 344:14 345:16,19,25
stage 274:17 289:8
                                   347:8 348:25 349:18,24,25
stairs 331:14
                                   350:6,8 352:6,25 356:25
stamp 120:7 121:19 125:7,15
                                   373:14,22 380:10,19
 135:11 140:3 146:18 147:6,12
                                 stenographer 8:24 54:18 85:8
 173:23 233:8 235:9 237:25
                                   153:19
stamped 102:11 116:14,15 117:22
                                 step 317:7
 123:11 133:3 148:7 164:24
                                 stepped 185:18 186:13
 175:13 230:11 231:10 243:15
                                 steps 109:12
 243:16 244:9 249:20 337:21
                                 stickers 216:5
 342:20
                                 Stinger 380:5
stand109:8 291:17 324:21
                                 stipulate 248:6 315:15
standing 224:25 279:11 316:16
                                 STIPULATED 6:3,7,10,13
 318:19 321:11 322:5,17 324:24
                                 STIPULATIONS 6:2
 325:9 329:20
                                 stole 239:22
stands 169:17 323:20
                                 stood 207:13 272:16 284:22
start 13:25 18:11,15 92:20
                                   288:3,5,19 317:6
 155:10 204:17 215:15 217:21
                                 stop 242:22 287:21 328:5 341:22
 222:5 253:13 272:25 301:14
                                 stopped 228:5
 315:22 323:17 330:8 333:21
                                 stopping 315:23
 335:15 372:2 377:5
                                 straight 114:17
started14:2 98:17 104:14 191:4
                                 Street 2:22 10:8,15 12:9,10
 198:5 268:16 272:21 282:13
                                   13:8,12 233:20
 301:17 302:14 331:18
                                 strike 262:9 263:5 290:4 291:24
starting 14:11 326:13
                                   302:2
starts 47:16 235:18
                                 structure 27:6
                                 student1:12 2:19 14:5,8 18:19
state 2:9 7:11,20 46:7 48:2
 75:22 89:21 102:9 133:2 148:6
                                   32:7 42:10,11 46:7,18 52:22
 148:11 153:18 175:12 189:10
                                   64:16 77:15 79:20 99:10 112:5
 357:21 375:15 380:6,16 382:2
                                   112:12 115:15,17 116:20,23,25
 384:12
                                   127:24 167:3 169:13 170:4
stated 49:11 271:6 383:5
                                   171:19,20 178:2,4,23 187:6,14
statement 79:17,18 94:23 246:18
                                   187:16,21,25 189:21,22 199:4
 250:2,6,8,9,11,15 251:2 279:9
                                   199:19,20 202:18 204:13,14,22
 279:24,25 280:5,12,15,17,23
                                   204:25 206:23 207:4,8,10,25
 281:5 283:17 316:20 319:6,7
                                   213:19 220:2 232:10,11 264:25
 348:20
                                  265:22 285:10,16 287:4,10,15
statements 280:2 306:13
                                   287:20 336:24 337:4 339:15
                                   340:16 347:9 348:25 349:18
States 1:2 192:21
station 254:15
                                   361:5 362:6,15,18,24 363:5,6
stationed 285:13
                                   363:14,15 364:3,10,16,18
status 46:21 78:3 79:15 192:17
                                   365:7 366:7 367:4,9,11 368:3
 351:25
                                   368:12 369:3 370:10 371:6,7
stay 273:15
                                   372:11,18 373:4,20 375:14,21
stayed 355:14
                                   376:4,23 377:11 378:8,17,20
staying 379:24
                                   379:8,15 380:5
Steakhouse 332:3,20
                                 students 24:17 27:7 46:11 48:4
Stenger 1:14 7:21,24 160:25
                                   48:12 49:25 64:18 65:24 92:13
 170:22 173:4 242:3 253:18
                                   92:16 100:21 156:5 168:21
```

```
179:16 185:24 205:7 207:4
 221:3 233:17 236:2 272:19,21
 272:25 274:9 281:10 282:6
 291:14 379:4
Studies 182:18
stuff 44:23 227:9 239:22
stumbled 331:22
subject 160:25 377:7
subpoena 6:6
substance 80:13 211:3 282:25
succeed 94:7
succeeded 76:15
successor 76:3
suggest 97:10
suggestions 96:19
suit 316:22,25 317:3 318:18
 320:4
Suite 2:17
sum 211:3 282:25 353:15
summer 26:18,20 27:16 43:18
 95:20,23 96:2 98:9
summon 224:9
summons 361:24
SUNY 46:9,10 47:21 141:9,10
 177:22 253:16 261:8,9 262:19
 266:9,12 268:3 274:6 279:10
 336:21,25 345:19,25 346:7
 356:23
support 157:10
supports 285:3
supposed 215:5 223:25 268:24
suppress 357:5
suppression 224:16 285:15,19
 297:14 357:2 373:14,16,22
sure 31:9 35:12 43:20 44:5,21
 78:2 86:13 108:20 111:19
 112:11 118:24 146:5,14 208:22
 220:18,19 221:25 225:20,25
 226:5 231:14 234:24 240:20
 249:9,17 256:20 270:12 304:10
 314:20 331:14 333:18,24 338:4
 363:8 365:11,16 368:5 371:3
 371:16
surround 273:2,4,7,9 297:6
surrounded 272:19 288:5,7
 296:25
surrounding 272:21 326:22
 327:14
surveillance 315:10
```

```
suspend 345:21 346:3,9 363:6,14
 380:20
suspended 46:7,18 47:6,8 337:3
 340:15,23 341:7 350:14 376:11
suspending 376:16
suspension 341:17 342:2 350:22
suspensions 350:17
swear 7:6
switch 141:21
switched 108:19 115:22 141:19
sworn 3:3 7:10,14 382:10 383:7
Syinsky 189:12 214:12 228:9
 244:23
symbol 338:17
system 35:6 201:3 285:7
systems 205:7,11,14,16,17 206:9
T3:9,9 4:2
T-shirt 276:11
T.P209:9 214:18,20,24 244:24
 245:14 247:20 301:10,19 304:3
 310:11,17,19,21
T.V144:24
table 47:8,10 49:23 51:7,10,17
 51:25 52:25 53:6 64:17,17
 67:6,20 68:15 69:17,21 88:14
 166:5,24 170:25 171:10 172:21
 173:7,14 177:23 178:4,13,16
 185:21 186:16,16,17,25 187:3
 189:7,24 190:25 191:10,10,15
 191:16,17 192:11 193:11 194:8
 194:13 195:19 196:4,5,7,9,12
 196:19 197:18 198:4,5,10,13
 198:14,21 199:4,21 200:10,17
 201:18 202:6,18 203:2 204:15
 206:19,20 207:3,10,17,19
 208:6,8 209:21 213:2 217:5,19
 220:2 222:9 227:23,24,24
 228:18 229:11 230:2 244:25
 247:3,6,10,18,20 253:4 301:10
 309:2 325:3 347:19 349:4,13
 365:22,23
tabled 53:15 178:21 202:7,20
 204:7,23 205:2 206:23 207:12
 208:2 348:3
tables 48:10 51:13,16 63:24
 64:2,6,25 67:16 68:12 70:6,12
 147:23 195:2 203:4 208:10
```

223:25 224:4 228:2 247:14

```
251:13 252:18 272:17 303:10
                                   329:16,20 335:6 339:4 345:13
tabling 36:10,12 48:23 51:17
                                  358:8 366:18 374:5 377:16
 52:4 53:17 64:16 65:19,20
                                   379:5
 66:3,16,20 67:14 68:25 69:3,6
                                 talks 157:18 236:14 362:5 363:4
 69:10,18,19,25 80:16,19 81:14
                                  368:20 371:24 374:2
                                 tall 248:12 262:2
 83:11 88:5,11 90:9 101:9,10
 101:11,13,13,16,20 107:8,10
                                 tally 27:23
 160:17 161:5,15,23 162:11
                                 taped 204:22
 170:17 171:2 177:21 178:7
                                 tapes 306:20
 179:4,10,11 180:14 181:8
                                 Tariffs 127:19 129:12
 183:10 184:2,8,21 185:2
                                 task 252:5
 187:17 188:11 197:16 199:8
                                 Taylor 189:12,15 214:12,16,23
 200:24 201:22 203:18 204:3
                                  215:9 216:20 228:9,10,10
 205:9 206:24 207:2,18 209:9
                                  244:23
 209:18 210:9,10,12 212:11
                                 team 335:23
 213:8 214:2 217:18 219:7,12
                                 technology 108:21 109:6
 219:20 220:24 221:15,21
                                 tell 7:6 9:20 24:14 29:14 34:10
 225:24 227:20 229:21,21 230:4
                                   71:8 77:6 114:8 116:10 150:23
                                  182:9,10 185:15 194:18 204:12
 230:6 238:19 240:5 241:19
 242:6,19 244:6,24 245:4
                                  216:19 219:6 227:6 237:10
                                  250:14 277:3 290:19 320:18,24
 246:23 253:4 254:8 256:17,22
                                   321:25 343:12 351:12 380:9
 257:20 258:15,21 277:21
 300:21 301:14,18,20 303:21
                                 telling111:13 298:18 373:5
 305:19,22 307:2 308:24 310:12
                                 tells 340:22
 310:21,23 337:5 340:17 347:10
                                 ten 4:25 46:11 120:11 121:5,25
 347:25 349:3,8,11,16 352:7
                                   178:21,25 179:24,25 181:10
 363:19 366:6 369:12 375:17
                                   191:4 194:23 217:21 230:8,23
 376:7 380:8
                                  232:20 235:10 238:4,12,17
take 9:13 96:12 97:11,13,14,16
                                  247:25 248:20 278:11 284:19
 100:6 105:2 109:12 133:11
                                  284:20 294:22 295:16 296:13
 146:3 148:8 234:23 235:4
                                  327:3
 242:22 255:8 279:11 300:15
                                 term 255:15,16 353:22 372:2
 336:21 345:20 346:2,8,19
                                 terminated 363:23
 361:13 372:25
                                 terms 111:19 363:17 365:21
taken 6:6 66:10 245:8 314:5
                                   367:14 369:9 372:16 376:14
 376:5 382:4 383:3
                                  377:24 378:7
talk 8:23 9:17 14:10 27:15
                                 testified 155:22 200:13 203:17
 36:22 38:10,10,11 143:21
                                  286:6 367:8 379:18
 150:7 161:19 174:13,21 216:16
                                 testify8:4 218:19 383:7
 270:2 306:23 350:2 372:17
                                 testimony 7:8 26:16 154:11
talked 32:18 38:4 41:24 49:5
                                  203:12 382:4 383:3,6 384:8
 54:3 56:3 71:18,19 72:5 78:12
                                 text3:11 37:21 42:25 43:2
 80:7 81:25 83:22 98:15 128:18
                                  108:2 151:7,8,9,21 185:17
 143:15 160:16 172:10,11 175:7
                                  186:6,10 292:13
 178:10 260:12 275:11 300:20
                                 texting 42:3,22,23
 306:24 307:3,5,6 322:25 329:6
                                 texts 41:22 186:9 292:11
                                 thank 41:2 116:4 155:7 175:11
 351:14
talking 43:16 48:11 64:5 90:11
                                  270:13 379:21
 98:18 174:17 222:24 256:9
                                 Thanks 103:10 134:8 136:3
 283:4 286:16,17 295:5 317:18
                                  140:14,20 167:4 174:23 176:15
```

```
235:18 238:11 239:6 249:4
 381:14
thereabouts 320:8
thing 9:5 22:20 45:2 267:6,6
 268:2 368:19
things 50:3 106:18 155:10 187:6
 207:14 214:15 215:7 216:4,6
 234:6 265:10 300:17 349:5
think 9:20 16:11 26:15 33:25
 44:8,17 45:2,5 57:9 62:23
 64:8 80:2 82:11,14 84:16
 87:22 91:7 104:24 108:3
 131:19 146:24 165:10 166:6
 173:19 190:15 193:22 194:10
 194:15 200:17 204:5,10 208:4
 210:22 212:14 218:6,18 219:18
 246:9 248:6 262:12 267:5,9
 275:12,14 280:24 293:13 313:5
 314:2,12,12 316:25 321:23
 333:15 341:5 370:8
thinking 44:19 182:5
third 322:5 368:22
thirteen 5:8 47:16 124:4 177:13
 232:8 284:19 285:12 337:21
 338:15 346:14,20 350:19
thirty 129:13 140:5 181:23,24
 183:21,23 198:9 220:22 221:6
 238:19 282:14 329:4 333:17
 336:20 337:17 384:9,10
thirty-353:2
thirty-eight 135:12,13
thirty-four 352:4
thirty-nine 134:2
thirty-one 330:6 347:3,7
thirty-seven 133:3 140:3 353:11
 353:25
thirty-three 375:12
thirty-two 175:13 349:14 375:11
Thomas 2:21 85:5, 10, 16, 20, 23
 86:4 238:10 352:9
thought 97:21 191:22 220:2
 239:12 256:9 267:7 269:14,16
 379:7
thousand 109:19 110:3,6 112:15
 113:5,7,13 155:19 353:3,12,25
thread 239:20
threatening 299:7,16
threats 264:25 265:21
three 4:9 20:17 38:3 43:6 78:13
 88:20,23 116:3 120:7 125:9
```

```
128:18 131:9 155:5,10 157:5
 167:17,19 168:11 178:22 182:7
 217:6,10,23,23 218:2 257:2
 293:5,8 321:12,13 322:6 325:8
 325:17 336:14 337:21 341:12
 341:19 342:4 353:3 369:24,24
throwing 93:17
thrown 226:7
Thursday 117:3 148:22 177:20
 337:6 340:17
ticketed 265:7,17
tickets 130:9,11,16
tie 317:17 318:17,18 319:22
till 183:19
time 1:19 6:6,15 8:23 11:10
 12:3 20:22,24 22:9,16 24:21
 24:22 26:5 30:9,11 31:15 32:2
 32:18 33:24 39:8,12 48:21
 49:13 50:7 52:22 57:14 61:18
 63:13,18 64:22 70:5,11,19
 71:12 73:3,4,5,8 74:23 76:21
 78:25 80:7 81:25 89:20 93:14
 93:15,21 94:13 95:17,19 98:7
 99:9,25 100:3,5 101:21 111:10
 112:21 129:2 133:11 135:21
 140:17,22,24 148:9 161:7
 162:25 166:19 178:13,16,22
 181:19,21 183:13 184:25
 186:10 187:24 189:18,20 191:3
 193:9 198:4 212:11 213:8
 225:4,6,7 226:24 228:22
 229:14 236:14 240:16 245:18
 251:25 252:19 260:10 276:13
 278:8 282:22 290:9 296:23
 298:18,23 303:14 307:6,22
 310:12 330:23 331:3,7,12
 333:2 343:21 344:9 347:22
 356:16 360:13 378:21 381:14
 382:4 383:4
times 13:10 57:4 58:20 67:5
 68:19 115:22 182:5 206:10
tired 284:24,25
title 127:17 162:18 175:20
titled 146:15 147:14
titles 83:3
today 7:8 8:5,17 22:10,11,13
 23:3 88:5,10 148:2 151:12
 174:20 194:12 200:7 235:24
 237:8 250:4 278:18 287:2
 288:12 292:2,4 295:13 313:13
```

```
343:7 358:20,24
                                   327:25 348:20 365:18
today's 102:8 164:20,22
                                 Tuesday 5:5 121:21 127:15
told 53:8 71:9,10 72:17 98:6
                                 turn 45:19 196:11 281:17 329:10
 101:23 119:13 200:6 210:11
                                   330:7
 220:18 223:6,8 225:23 240:4
                                 turning 56:21 88:13 92:21
 264:23 265:12 266:9,23 267:14
                                   186:24 187:2,4,8,21,25 189:6
 268:24 271:3,16 278:18 281:22
                                   189:24 190:5 191:10,15 192:8
                                   192:10,13,14 193:10 194:12
 281:24,25 298:15
Tom 61:9 75:2,5,10 351:14
                                   196:4,6,21 197:18 198:13,15
 360:17 361:4
                                   198:21 208:2,8,16,24 209:4,22
                                   210:4 214:9,17,20 216:4,11
Tommy 86:2
                                   219:20 220:6,16 228:4,7,15,17
tomorrow1:12 144:3 169:18
top 29:20 40:6 74:20 116:22
                                   228:19 244:24
 117:2 148:18 175:19 188:10
                                 twelve 5:6 45:25 64:9 164:25
 204:20 208:5 314:3 321:11
                                   173:23 177:12 181:22,24 233:9
 344:20 358:4 366:15
                                   235:2 246:5 248:4,18 249:16
total 211:20 353:4
                                   285:8 323:21
totaling 353:2
                                 twen 328:14
touch 78:15 163:12 328:9 342:8
                                 twenty 8:2 46:11 109:21 148:8
 342:13 344:3
                                   155:9,13,16 195:16 239:14
Tower 65:24
                                 twenty-8:2 211:20 212:9 320:15
trade 115:16 127:19 129:12
                                   328:2,14
traffic 64:18 177:21,24
                                 twenty-five 297:12 325:12 326:3
transcript 8:10 40:20 382:5,7
                                   329:4,9
                                 twenty-four 294:17 323:15,21
 384:8,10,11
transcription 383:9
                                   324:14,22 328:8
                                 twenty-one 270:20 315:18,21
transfer 91:15
transferred 91:14 229:4
                                   317:9
                                 twenty-seven 246:5 347:4
transportation 353:5 354:5
transportations 353:6
                                 twenty-six 327:2 330:6
trap 365:18
                                 twenty-three 279:7 282:10 319:2
treasurer 28:6,18 29:5 83:3
                                   320:8 323:14
 158:14,22 159:2,5 365:9,15
                                 twenty-two 38:24 41:19 103:6
                                   104:12 211:8 273:24 299:25
trial 6:9,16
tried 36:17 198:20 201:24
                                   318:19
 202:10 228:10 288:8 289:4
                                 Twitter 358:5,17
trip 331:18
                                 two 4:7 8:3 10:17 14:3 20:17
tripped 331:13,14
                                   21:15 30:21 31:18 32:19 34:13
trouble 368:6
                                   48:13 51:12,21 52:25 54:16
true199:25 200:2 241:11,13
                                   78:12 98:7 100:23,24 102:8,11
                                   102:12,13,13 103:7 132:3
 382:5,7 383:10
                                   133:3,3,25 135:11,13,18 140:3
Trump 129:11 196:3 197:7,11
 236:10 285:2,5
                                   140:5 147:6,6,6 153:2 156:15
Trumps 127:19
                                   157:9 158:3 160:2 181:15
truth 7:7,7,7 383:7,7,8
                                   185:8,24 188:8 190:7 203:4
try 8:25 9:6 53:6 94:15 194:9
                                   208:10 211:21 212:10 217:22
 201:21 212:18 314:24 361:9
                                   217:24 218:2 228:24 229:2
                                   230:11,12,23 231:10,10 232:7
trying 18:25 40:22 41:22 53:4
 93:16 108:20 212:15 224:3
                                   232:20,20,20 233:8 235:10
                                   237:25 238:17 239:4,13,20
 227:9 228:20 273:4,7 314:14
```

```
244:9,10 249:18,20,20 261:17
                                   282:11 294:15 297:11 302:16
 266:11 270:22,25 280:2 294:20
                                   304:19 317:8 323:18 332:16
 302:23 313:23 314:5 315:12
                                   337:23 339:14 342:18 344:24
 321:11 325:8 327:11 329:15
                                   348:22 363:9 364:6,8 369:13
 336:14 341:11,19 342:4 345:9
                                 uh-hum 9:8
 357:24 358:4,5,10 359:24
                                 ultimate 124:25
two-line 337:2
                                 ultimately 114:21 115:12 126:19
two-minute 282:16
                                 um-um 9:8
typewritten 383:8
                                 umbrella 48:20
                                 unable 281:10
typical 245:6
typo 166:12
                                 unaccurate 241:5
                                 unconstitutional 349:15
               U
                                 underfunded 94:12
U3:9
                                 understand 18:25 162:6 166:23
U.P.D 162:6,7,9,11 224:12
                                   304:11 361:14 365:17,25
 253:16 260:18,20,25 262:19
                                 understanding 91:23 115:9 170:8
 264:23,24 265:4 266:13,16,24
                                   192:23,24 193:3 203:15 205:22
 270:23 271:6 273:12 279:9,23
                                   205:23 207:11 315:11 364:2
 280:5 285:13 286:22 287:18,19
                                   365:13,22 368:9 371:20 374:3
 293:18 294:20 298:13,18
                                 undertake 200:23
 330:22 331:3 334:25 335:20
                                 undertaken 200:7
U.P.D.'s 299:25
                                 underwriting 156:2
U.S 352:10
                                 underwrote 156:9,13
U.S.A56:21 88:14 92:22 186:25
                                 uniformed 261:3
 187:2,4,8,21,25 189:7,24
                                 unilaterally 266:10
 190:5 191:16 192:8,10,13,14
                                 unincorporated 46:10
 193:11 194:13 208:2,8,16,24
                                 union 147:14,19 368:23 369:6,15
 209:4,9 210:4 214:9,18,20,21
                                 United1:2 192:20
 214:24 216:11 219:20 220:17
                                 univer 108:20
 228:4,7,15,18,19 244:24
                                 university 1:5, 14, 20 2:14, 17
 245:14 247:20 301:10,20 304:4
                                   4:6 15:21 16:23 18:14 21:23
 310:11,17,19,21
                                   24:4,5 25:5,7 43:22 46:5,8
U.S.A.'s197:18 244:24
                                   49:9,23 51:3,10 53:12 60:5
Uh-huh 8:22 17:14 28:17 46:2
                                   95:21 101:22 107:21 110:13,15
 54:6 60:21 63:10 68:7,10
                                   110:18 111:6,8,19 112:7,11
 70:10 71:11 82:18 86:11
                                   118:10,11 120:15 122:4 123:24
 102:19 105:7 112:9 113:23
                                   131:21,22,23 132:3 155:9
 114:2,18 119:21 122:15 123:12
                                   157:13,17 159:8 160:18,19
 125:10 126:2 134:9,17 138:7
                                   161:18 162:9 164:24 166:23
 140:11 144:2,7 145:13 148:14
                                   168:25 169:2,6,8 218:12 219:3
 148:20 152:24 153:12 164:21
                                  219:4,6 255:7 283:20 334:9,11
 167:6 170:12 171:15 175:21
                                   334:16,19 336:23 337:4 339:16
 177:9,15,18 184:24 198:2,25
                                   340:16 362:19,23 366:7 367:5
 199:24 208:25 211:4,22 212:20
                                   369:15 374:6
 218:25 221:19 230:25 231:13
                                 university's 44:9 349:16 379:7
 232:9 233:10 234:13 235:11,17
                                 unsure 111:7 130:3 137:19 233:2
 235:20 236:15 238:3 239:15
                                 upcoming 178:24
 244:7,12,17 245:24 249:3,14
                                 update 235:24 239:21
 259:6 262:23 264:20 266:7
                                 urged 285:11
 270:4,18 272:15 276:7 279:17
```

```
USA 220:6
                                  212:1 213:1 214:1 215:1 216:1
use 48:19 96:20 106:8 108:4
                                  217:1 218:1 219:1 220:1 221:1
 115:15,23 131:9 133:21,22
                                  222:1 223:1 224:1 225:1 226:1
 164:2 255:9,19 270:10 291:20
                                  227:1 228:1 229:1 230:1 231:1
 341:5 380:6
                                  232:1 233:1 234:1 235:1 236:1
                                  237:1 238:1 239:1 240:1 241:1
usually 239:7
utilization 292:11
                                  242:1 243:1 244:1 245:1 246:1
                                  247:1 248:1 249:1 250:1 251:1
utilize 105:23 269:8 292:17
utilized 107:18 130:25 307:21
                                  252:1 253:1 254:1 255:1 256:1
                                  257:1 258:1 259:1 260:1 261:1
               V
                                  262:1 263:1 264:1 265:1 266:1
v1:1,9 2:1 3:1 4:1 5:1 6:1 7:1
                                  267:1 268:1 269:1 270:1 271:1
 7:24 8:1 9:1 10:1 11:1 12:1
                                  272:1 273:1 274:1 275:1 276:1
 13:1 14:1 15:1 16:1 17:1 18:1
                                  277:1 278:1 279:1 280:1 281:1
 19:1 20:1 21:1 22:1 23:1 24:1
                                  282:1 283:1 284:1 285:1 286:1
 25:1 26:1 27:1 28:1 29:1 30:1
                                  287:1 288:1 289:1 290:1 291:1
 31:1 32:1 33:1 34:1 35:1 36:1
                                  292:1 293:1 294:1 295:1 296:1
 37:1 38:1 39:1 40:1 41:1 42:1
                                  297:1 298:1 299:1 300:1 301:1
 43:1 44:1 45:1 46:1 47:1 48:1
                                  302:1 303:1 304:1 305:1 306:1
 49:1 50:1 51:1 52:1 53:1 54:1
                                  307:1 308:1 309:1 310:1 311:1
 55:1 56:1 57:1 58:1 59:1 60:1
                                  312:1 313:1 314:1 315:1 316:1
 61:1 62:1 63:1 64:1 65:1 66:1
                                  317:1 318:1 319:1 320:1 321:1
 67:1 68:1 69:1 70:1 71:1 72:1
                                  322:1 323:1 324:1 325:1 326:1
 73:1 74:1 75:1 76:1 77:1 78:1
                                  327:1 328:1 329:1 330:1 331:1
 79:1 80:1 81:1 82:1 83:1 84:1
                                  332:1 333:1 334:1 335:1 336:1
 85:1 86:1 87:1 88:1 89:1 90:1
                                  337:1 338:1 339:1 340:1 341:1
 91:1 92:1 93:1 94:1 95:1 96:1
                                  342:1 343:1 344:1 345:1 346:1
 97:1 98:1 99:1 100:1 101:1
                                  347:1 348:1 349:1 350:1 351:1
 102:1 103:1 104:1 105:1 106:1
                                  352:1 353:1 354:1 355:1 356:1
 107:1 108:1 109:1 110:1 111:1
                                  357:1 358:1 359:1 360:1 361:1
 112:1 113:1 114:1 115:1 116:1
                                  362:1 363:1 364:1 365:1 366:1
 117:1 118:1 119:1 120:1 121:1
                                  367:1 368:1 369:1 370:1 371:1
 122:1 123:1 124:1 125:1 126:1
                                  372:1 373:1 374:1 375:1 376:1
 127:1 128:1 129:1 130:1 131:1
                                  377:1 378:1 379:1 380:1 381:1
 132:1 133:1 134:1 135:1 136:1
                                  382:1 383:1 384:1,4
 137:1 138:1 139:1 140:1 141:1
                                 V-A-S-O-U-E-Z 54:23
 142:1 143:1 144:1 145:1 146:1
                                 V.P28:24 31:25 33:8
 147:1 148:1 149:1 150:1 151:1
                                 vagueness 299:12
 152:1 153:1 154:1 155:1 156:1
                                 valid111:15 286:8
 157:1 158:1 159:1 160:1 161:1
                                 var 364:3
 162:1 163:1 164:1 165:1 166:1
                                 variety 48:9
 167:1 168:1 169:1 170:1 171:1
                                 various 213:15 364:4
 172:1 173:1 174:1 175:1 176:1
                                 Vas 54:22
 177:1 178:1 179:1 180:1 181:1
                                 Vasquez 54:13,25 55:2,9 57:12
 182:1 183:1 184:1 185:1 186:1
                                  87:12 167:16 305:23
 187:1 188:1 189:1 190:1 191:1
                                 Vasquez's 87:10
 192:1 193:1 194:1 195:1 196:1
                                 vehicle 273:15
 197:1 198:1 199:1 200:1 201:1
                                 Vehicles 13:21
 202:1 203:1 204:1 205:1 206:1
                                 Venice 142:13 144:5,9,11
 207:1 208:1 209:1 210:1 211:1
```

```
verbal 9:7,9
verified 11:5 23:23
version 283:22 338:24
versus 163:6
Vestal 1:21 2:16 10:8,12 13:13
 14:13 15:13 233:21
veto 255:6, 10, 16
vice 28:6 33:7 302:8,20 303:17
 339:15 344:16,17
vice-president 83:2
video 5:13 35:22 273:10 288:14
 288:16 290:20 306:9,12 312:16
 312:21 314:4,18,21 315:10,10
 315:12,16,23 316:6 322:15
 330:14,17 331:5 332:24
view183:9 269:3
views 269:9 349:20,24 350:7,11
 375:16 376:18,25 378:25 380:7
violated 336:23
violation 271:20 279:19 280:21
 337:3 340:15 376:5,6
visible 129:14
voice 282:22 359:9
voices 299:20 359:3,5
voluntarily 298:15
volunteer 55:12
volunteers 55:13
vote 27:22 76:18
voter 13:3
voters 13:2
W238:10
waiting 334:3
```

walk 49:25 207:5 330:16 walked 205:25 206:7 Walker 89:18,19 278:19 319:18 walking 256:8 324:11 330:8 wall 289:5,9 321:4 want 9:17,21,21 12:14 14:19 15:24 21:12,16 44:2,20 45:14 96:15,16 100:2 147:3 150:17

```
152:7 163:20,22 176:11 190:8
 193:5,6 234:25 236:6 242:22
 313:6 314:20,25 330:3 338:4
 357:21 361:13,17 365:18
wanted 24:18 82:2 91:13 96:11
```

```
99:6 108:23,24 109:4,5,7
110:5,16 130:17 150:25 161:19
```

```
185:22 209:21 210:15 217:19
 225:20 263:22 264:16 265:13
 265:13 332:14 343:22 367:25
wants 9:20 312:17 365:23
Wars 127:19 129:12
Washington 2:7 16:18 17:3,16,21
 19:6,23 25:21 33:20 37:11
 61:3 73:14 306:25
wasn't61:18 62:5 203:7,8 209:6
 211:23 229:13 256:10 260:13
 350:4 359:8 360:2 378:21
 379:11
watch 273:10 281:18 290:20
 312:16 330:3
watching 314:21 315:10,22
 322:15
waved 298:5 331:24
way 42:2 73:3,4,7 95:5 100:4
 106:16 222:15 262:8 269:6
 286:8 288:9 294:12 299:16
 309:19 312:18 315:23 364:5
 365:3
we'll 33:14 36:22 45:13 88:8,15
 93:8 107:13 117:21 148:4
 151:18,19 159:21 160:12 162:4
 242:22,23 249:8 254:6 264:21
 267:17 273:10,11 290:20
 308:19 310:8 314:9 322:19,19
 326:20 372:25 375:10
we're 7:23 18:12 40:15 45:14
 64:5 87:22 90:11 131:18
 159:18 207:18 213:24 219:11
 243:5 267:12 314:21 315:9,9
 315:13,16,22 319:2 323:13
 328:14 329:9 347:5,6 352:19
 363:4 369:11 377:16
we've 24:2 26:16 32:24 39:7
 54:3 56:3 72:5 78:12 82:11
 88:4 99:22 107:8,22 131:19
 178:10 237:14 307:8 320:7
 327:22 329:6 346:14,20
wearing 276:11,12 277:2,8,10,10
 286:18 316:17,22 317:17
 318:17 319:20,21 320:4,9,17
 320:24 321:3,7,12,16 322:7,15
 322:21 323:23
website 96:13 366:23
week 103:12 163:3
weekend 93:17 95:9,11 167:4
 257:10
```

320:4 332:22

```
worked 17:2 31:2 99:12 115:14
weeks 14:3 34:13
weigh 60:11
                                   243:2
welcome 282:21
                                 working 104:14 143:3 227:24
went14:15 15:7 16:2 18:22 56:7
                                   269:12 307:5
 87:12 97:19 99:13 114:17
                                 works 56:20 103:21
 137:24 159:14 168:14 176:9
                                 worries 328:10
 181:17,18 185:22 256:9 331:10
                                 worry 185:21 239:7
 332:3 333:5
                                 worth 180:22
                                 would've 25:5,7 27:19 125:24
weren't11:20 47:12 70:15 75:5
                                   130:25 139:2,2
 240:20 263:13 310:15 341:7
 357:17
                                 wouldn't150:17,17 248:17
Whatever's 41:13
                                   279:18 288:15 368:13 372:13
whatsoever 346:13
                                 write 31:14 137:9 231:6 239:16
when's 22:15 78:25
                                   346:25
white 261:24
                                 writing 218:5 258:17
Why'd149:3
                                 written 224:15 239:13 306:13
wide 48:8
                                   362:14
wielding 289:24 294:24 295:5
                                 wrong 203:16 365:23
window 183:9
                                 wrote 240:2 241:10 378:17
Winner 156:4
                                                 X
Wire 305:22 306:13
wish 9:13
                                 X1:16 3:2 4:2,2 382:8,11
withdraw 78:17
                                                 Y
withdrawn 362:12
                                 Y.A.F3:15 4:6 370:19 371:6,12
witness 6:10,14 7:10,13,14 19:9
 19:12 33:3,7,9 41:3,13 49:8
                                   371:14,20 372:6 374:3,3,10
                                 Y.A.F.'s 349:20
 63:2 80:10,12 82:13 86:9
                                 YAF 21:23 92:20,23 93:4,6,8,11
 116:5 132:9 146:21 150:3,21
                                   94:4 95:18,20 96:2,12 97:10
 150:25 151:22 152:7,10,13
                                   97:10,12 98:18,18 99:3,16,16
 166:8,11,13 186:9 222:3
                                   103:14 108:2,5 109:23 113:16
 231:16,18,21 244:17 251:20
                                   113:25 114:3,5,7,17 130:21
 263:19 270:10,13 314:24
                                   135:18 142:7 233:21 253:15
 333:21 338:6,8,10 345:9
                                   259:16,24 260:7 262:18 264:23
 360:22 383:6
                                   265:5 266:9 270:23 271:2
witness's 315:13
                                   273:13 279:9 283:12,15,22
witnesses 45:8 80:22,23 88:4
                                   290:5 291:3 311:23,24,25
woman 56:6 96:17 316:16 317:5
                                   312:3,7 354:15,19
                                 YAF's 99:10 291:5 353:6 354:13
 321:4 325:20
                                 yards 195:14
wondering 360:14
                                 yeah 16:6 17:8 19:4 21:9,14
Woodward 141:10,14 320:2
                                   27:8 29:4,13 30:4 32:9,23
word 46:14 48:18,19 134:7 135:2
                                   33:2,9,12 34:18,20 37:17
 138:24 255:9,14,19 304:13
                                   38:21 40:24 41:17 44:7,16,19
 322:22 353:23 384:16,18,19,20
                                   45:11,13 49:4 63:6,12 73:5,21
 384:21,22,23
                                   73:24 74:25 75:19 82:14 84:18
words 8:25 209:10 213:14 292:13
                                   84:19 89:4,7 90:17 92:3 99:24
 297:7 338:17 347:17 358:16,17
                                   100:3 101:17 102:13,15 117:25
work 10:17 13:3 20:19 21:2
                                   128:5 132:4,12,24 135:14
 51:12 55:12 92:19 108:20,22
                                   147:4 148:3 149:24 150:2
 135:21 269:13 305:23 360:5
```

```
152:14 155:6 163:17 165:10
                                 Zegers 56:13,14 167:15
 166:15 183:24 184:16 186:18
                                 zero 31:19 118:20 125:25,25
 195:4,6,13,15 198:7 202:2
                                  128:16,16 230:11 231:10 235:2
 207:23 208:21 212:17 217:24
                                  235:16 237:25 244:9 279:6
 218:22 222:25 227:2 229:6
                                  281:7 282:8,9,13,17 319:2
 231:17 241:2 247:12 248:9,17
                                  320:16 344:21,21,21,21,21,23
 251:8 257:5 267:19 275:4
                                  344:23,23
 278:9 284:13 288:16 293:16
                                 ZIP 12:11
 305:7 308:9,21 309:8 310:8
                                                 0
 314:14 315:5,24 316:12 321:21
 327:19 335:8 338:9 351:12
                                                1
 358:2 364:11 368:10 369:23
                                 1 383:5,9
 370:15 371:16 381:17
year 14:16,17 15:4,6,16,17 25:4
                                 1/10/2023 384:5
                                 1/10/231:1 2:1 3:1 4:1 5:1 6:1
 25:5,7 26:2,11 27:19 28:16
                                  7:1 8:1 9:1 10:1 11:1 12:1
 57:18 65:17 74:4 76:7,7 77:22
                                  13:1 14:1 15:1 16:1 17:1 18:1
 79:3,7,10 80:8 93:23 95:21,22
                                  19:1 20:1 21:1 22:1 23:1 24:1
 99:14 148:25 170:16,24 171:2
                                  25:1 26:1 27:1 28:1 29:1 30:1
 171:9 172:21 173:7,14 302:8,9
                                  31:1 32:1 33:1 34:1 35:1 36:1
 302:9,10,11,22 303:16 351:21
                                  37:1 38:1 39:1 40:1 41:1 42:1
year-26:2
                                  43:1 44:1 45:1 46:1 47:1 48:1
year-and-a-half 18:23 26:4
                                  49:1 50:1 51:1 52:1 53:1 54:1
yearly 92:15
                                  55:1 56:1 57:1 58:1 59:1 60:1
years 10:17 14:17 15:22 24:21
                                  61:1 62:1 63:1 64:1 65:1 66:1
 73:5 77:17 78:13 377:14,15,21
                                  67:1 68:1 69:1 70:1 71:1 72:1
 377:23 378:12 379:5
                                  73:1 74:1 75:1 76:1 77:1 78:1
yelling 284:24
                                  79:1 80:1 81:1 82:1 83:1 84:1
yep 13:13 27:24 41:2 87:16
                                  85:1 86:1 87:1 88:1 89:1 90:1
 131:25 136:9 151:15 154:25
                                  91:1 92:1 93:1 94:1 95:1 96:1
 167:19 249:11 262:4 277:23
                                  97:1 98:1 99:1 100:1 101:1
 314:16 319:23
                                  102:1 103:1 104:1 105:1 106:1
York 1:3,22 2:9,13,18,23 7:20
                                  107:1 108:1 109:1 110:1 111:1
 8:2 10:8,12 13:13 15:11 46:8
                                  112:1 113:1 114:1 115:1 116:1
 89:21 95:5 233:21 384:12,14
                                  117:1 118:1 119:1 120:1 121:1
York's 352:10
                                  122:1 123:1 124:1 125:1 126:1
Young 1:6 7:24 56:19 90:13,16
                                  127:1 128:1 129:1 130:1 131:1
 91:24,25 93:6 99:7 103:22
                                  132:1 133:1 134:1 135:1 136:1
 104:3 107:18 154:16 155:25
                                  137:1 138:1 139:1 140:1 141:1
 157:7,24 160:2 250:20 254:25
                                  142:1 143:1 144:1 145:1 146:1
 289:15,23 371:17,19,21,25
                                  147:1 148:1 149:1 150:1 151:1
 372:2,6,10,22,25 373:2,5
                                  152:1 153:1 154:1 155:1 156:1
 374:4 377:4,7
                                  157:1 158:1 159:1 160:1 161:1
younger 261:22
                                  162:1 163:1 164:1 165:1 166:1
YouTube 55:6 87:13,15 306:9
                                  167:1 168:1 169:1 170:1 171:1
 311:11
                                  172:1 173:1 174:1 175:1 176:1
Yup 242:25 325:21 344:21
                                  177:1 178:1 179:1 180:1 181:1
                                  182:1 183:1 184:1 185:1 186:1
Z-E-G-E-R 56:15
                                  187:1 188:1 189:1 190:1 191:1
                                  192:1 193:1 194:1 195:1 196:1
Zeger 56:16,17
```

```
197:1 198:1 199:1 200:1 201:1
                                 12224 2:13 384:14
 202:1 203:1 204:1 205:1 206:1
                                 127 5 : 4
 207:1 208:1 209:1 210:1 211:1
                                 1292 4:22
 212:1 213:1 214:1 215:1 216:1
                                 12th 127:15 128:24 235:16
 217:1 218:1 219:1 220:1 221:1
                                 135:9
 222:1 223:1 224:1 225:1 226:1
                                 130 3:15
 227:1 228:1 229:1 230:1 231:1
                                 132 4:11
 232:1 233:1 234:1 235:1 236:1
                                 135 3:16
 237:1 238:1 239:1 240:1 241:1
                                 138 3:17
 242:1 243:1 244:1 245:1 246:1
                                 13850 10:9
 247:1 248:1 249:1 250:1 251:1
                                 13902 1:22 2:18
 252:1 253:1 254:1 255:1 256:1
                                 13905 2:23
                                 1488:5 120:23 121:2 177:20
 257:1 258:1 259:1 260:1 261:1
 262:1 263:1 264:1 265:1 266:1
                                  231:12
 267:1 268:1 269:1 270:1 271:1
                                 144-145 5:15
 272:1 273:1 274:1 275:1 276:1
                                 146 4:14
 277:1 278:1 279:1 280:1 281:1
                                 1484:16
 282:1 283:1 284:1 285:1 286:1
                                 14th 69:9 189:16 194:18 200:23
 287:1 288:1 289:1 290:1 291:1
                                   201:19,22 206:25 208:2,3,13
 292:1 293:1 294:1 295:1 296:1
                                   211:13 212:23 213:3 214:24
 297:1 298:1 299:1 300:1 301:1
                                   218:9 230:22 231:25 238:12,17
 302:1 303:1 304:1 305:1 306:1
                                   239:14 241:10,19,24 242:6,11
 307:1 308:1 309:1 310:1 311:1
                                   242:19 245:4,8 247:8,15 250:2
 312:1 313:1 314:1 315:1 316:1
                                   256:22 257:20 258:10 301:21
                                  337:6 340:18
 317:1 318:1 319:1 320:1 321:1
 322:1 323:1 324:1 325:1 326:1
                                 15 140:9 257:3
 327:1 328:1 329:1 330:1 331:1
                                 15th 165:24 166:3,9
 332:1 333:1 334:1 335:1 336:1
                                 16257:3
 337:1 338:1 339:1 340:1 341:1
                                 163 4:18
 342:1 343:1 344:1 345:1 346:1
                                 16th 143:25
                                 17 257:3
 347:1 348:1 349:1 350:1 351:1
 352:1 353:1 354:1 355:1 356:1
                                 1700 2:6
 357:1 358:1 359:1 360:1 361:1
                                 173 4:21
 362:1 363:1 364:1 365:1 366:1
                                 175 4:23
 367:1 368:1 369:1 370:1 371:1
                                 178 12:11
 372:1 373:1 374:1 375:1 376:1
                                 1827:10 50:9,10,10 89:10
 377:1 378:1 379:1 380:1 381:1
                                   119:15 124:23 126:16 129:12
 382:1 383:1 384:1
                                   263:8 380:25
1:10 243:4
                                 18/'1928:16
1:37 270:14
                                 18th 60:18 128:22 130:22 133:7
101:18 137:9,24
                                   139:17 156:6 243:20 253:15
                                   256:23 257:6,21 258:11 259:4
10:17100:8,8
                                   314:6 315:12
10:59146:8,8
102 4:7
                                 19 16: 9, 13, 15, 15 17: 6, 15, 17, 18
                                   17:21 19:14,15 26:12,20 71:14
106 3:12
113 3:14
                                   79:11 98:9 101:16 211:11
114-118 4:10
                                   215:22,22
116 4:9
                                 1999 10:6
119-120 4:17
                                                 2
```

```
2 18:6
                                  2022 12:15 74:4 148:23 152:11
20 15:24 146:16 152:11 211:10
                                   306:18 314:19
 211:10 352:7
                                  20231:18 382:10
20-CV-0822 1:9 384:4
                                  208-218 5:3
2000 61:23 101:12
                                  21 117:8 128:7,11 152:23 154:23
20006-4707 2:7
                                   154:24 175:25
2005 72:23
                                  21st 117:3
2014 101:14 107:8
                                  22 21:6 74:7 78:4 152:23
2017 14:19,19 15:2
                                  230 4:25
2018 15:8,24 16:2,17 25:8,11
                                  237-247 4:13
 27:2 36:23 63:14 64:23 65:12
                                  239 3:16
 66:4 69:5 70:20 71:6,6,13
                                  23rd 352:10
 93:25 100:19 130:22 177:20
                                  24 121:21
 203:11,17 302:15
                                  2435:8
2019 4:13 11:11,25 12:8 13:11
                                  2445:16
 16:17 19:6,7 25:23 26:17
                                  249 5:6
 27:16 34:6 36:5 38:18 41:20
                                  24th 10:6
 43:3,15,16 47:13 48:22,22
                                  259-260 5:7
 50:5,7,14,19 52:10 58:8 60:18
                                  25th 152:13,14 166:2,7,8,16,19
 61:7,24 63:15,19 64:24 67:14
                                  26 4:12 5:13 102:17 164:25
 67:21 68:3,9 69:8,18 70:3,8
                                   165:12 173:23 313:10 314:19
 70:21 71:3,20 73:7 76:13
                                  26th 133:7 148:22
 77:21 79:15 86:13 88:5 89:10
                                  27th 134:5
 93:11,25 94:2 95:23 96:2
                                  28 118:15 120:6 166:25 174:18
 102:18 103:5 104:6 117:3,8,8
                                  28th 135:17 173:25 174:23
 118:15,18 119:15,23 120:6,23
                                  29103:5 104:12 176:16
 121:2,22 123:3,6 124:23
                                  29th 102:18
 125:16,19 126:16 127:15 128:7
                                                 3
 128:22,24 133:7,8 134:5
 135:17 137:9 139:17 143:25
                                  312:19 17:3
 154:23,24 165:25 166:3,19
                                  3:251:19 381:18
 170:16,24 171:2,9,23 172:21
                                  30 3:10 384:9,10
                                  308 3:21
 173:7,14,25 174:18 176:2,16
                                  31 125:18
 187:9 194:18 199:9 200:8,23
                                  310 3:22
 203:13,21,22 206:13 208:3,13
                                  313 5:14
 209:3 211:9,13 212:23 213:3
 213:13 214:24 215:18 218:9
                                  338 5:10
                                  342 5:12
 230:22 231:11,12 232:2 233:12
 233:23 235:16 238:12,17
                                  361 3:5
 239:14 241:11,19,24 242:6,11
                                  379 3:6
                                  381 383:9
 243:20 245:4,9 247:8,15
 251:16 252:13,19 253:15
                                  3rd 125:16
 256:23 257:20,21 258:11 259:4
                                                 4
 263:8 301:21 302:18 303:3,4
                                  433:11
 303:22 314:6 315:12 357:18
                                  44001:21 2:16
 372:9 380:25
                                  462:22
2020 18:6, 9 19:8, 9 20:5, 6 61:16
                                  4th 314:19
 75:11 76:16 77:24 352:7
2021 12:15 15:24 20:15,22 25:16
                                                 5
```

54:5,10 **501** 12:19 17:3 **501(c)(3)** 92:7 157:8 187:5 192:15 **523-7887** 384:2 6 **600** 10:8,15 12:9 13:12 233:20 **614** 2:17 7 **7**3:4 118:18 119:5,10,23 7th 337:6 8 **8**123:2,6 231:11 233:23 **8:50**1:19 7:2 800 384:2 **815** 12:10 13:8 **8th** 135:17 231:25 233:12 235:13